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Planning Policy

Planning Statement
LA02/2021/1205/F

Unshinagh Wind Farm, Co. Antrim

June 2026

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Our reference
04433

2026

1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of RES Ltd in support of application for full planning permission (Ref: LA02/2021/1205/F) for the proposed windfarm known as Unshinagh. The proposal now comprises nine (reduced from 14) three-bladed , horizontal-axis wind turbines, each with a maximum tip height of up to 180 metres, together with all associated infrastructure and ancillary works.
- 1.2 The site is located approximately 4 km southwest of the village of Carnlough, County Antrim. The site location is illustrated in **Figure 1.2**.
- 1.3 The purpose of this report is to outline the site's context and planning history, set out the relevant legislative and planning policy framework, and assess the proposal against these policies to demonstrate compliance.
- 1.4 The statement is structured as follows:
- Section 2 outlines the site and surrounding area;
 - Section 3 sets out the current position for Renewable Energy in Northern Ireland;
 - Section 4 sets out the revised proposed development;
 - Section 5 sets out the legislative and planning policy context for the site;
 - Section 6 sets out a summary of the Notice of Opinion issued by the Department.
 - Section 7 assesses the proposed development against the relevant planning considerations; and
 - Section 8 provides a summary of the planning assessment and the concluding statements.

2. Site and surrounding area

- 2.1 The application site is located within the townlands of Drumourne, Unshinagh Mountain, Unshinagh South, Ticloy, Slane, Cregcattan (part of Galdanagh) and Aughareamlag, approximately 4 km southwest of Carnlough, County Antrim. Access is achieved from the Ballymena–Carnlough Road (A42).
- 2.2 The lands are currently utilised for sheep and cattle grazing and comprise predominantly semi-improved agricultural grassland. The site has an established network of stoned farm tracks that enable access. Field boundaries consist of mature hedgerows and traditional stone walls.
- 2.3 The site is situated within the Antrim Coast and Glens Area of Outstanding Natural Beauty (AONB), approximately 2.8 km southwest of Carnlough and 17 km northeast of Ballymena. The proposed turbines are positioned on upland grazing land between the townlands of Unshinagh and Ticloy, within the Garron Plateau uplands, southeast of Cleggan Forest and below the summits of Berry Hill, Binnagee and Neill's Top. The surrounding landscape consists primarily of semi-improved agricultural uplands with farm tracks and fields defined by mature hedgerows and stone boundary walls.
- 2.4 The site lies within a landscape that is designated as both a Special Area of Conservation (SAC) and an Area of Special Scientific Interest (ASSI). While the revised site layout remains outside the Antrim Hills Special Protection Area (SPA), the SPA adjoins the site boundary and is designated for the conservation of hen harrier and merlin. The proposed development area is located downslope of the Garron Plateau SAC/ASSI.

3. Renewable Energy – Northern Ireland

Climate Change Act (Northern Ireland) 2022

- 3.1 The Climate Change Act creates a target for net-zero greenhouse gas emissions by 2050, with bridging targets including at least a 48% reduction in net emissions by 2030.
- 3.2 The Act sets targets for the years 2030, 2040 and 2050, including:
- A reduction of greenhouse gas emissions;
 - Providing a system of carbon budgeting;
 - To provide for reporting and statements against those targets and budgets;
 - To confer power to impose climate change reporting duties on public bodies; and,
 - To provide for reports and advice from the Committee on Climate Change.

Programme for Government 2024-2027 ‘Our Plan: Doing What Matters Most’

- 3.3 On 27 February 2025, the Northern Ireland Executive agreed a Programme for Government (PfG) 2024-2027 ‘Our Plan: Doing What Matters Most’. It outlines their priorities for making a real difference to the lives of people in Northern Ireland.
- 3.4 The PfG sets out several ambitious priorities including targets for renewable energy. It sets a target of 2027 whereby the Executive will have supported the renewables industry to increase renewable electricity capacity by 40%, to support delivery of the 80% renewable electricity by 2030 target within the Climate Change Act.
- 3.5 The PfG also commits to developing a Renewable Electricity Support Scheme that will help both in the delivery of self-sufficiency in affordable renewable energy and in achieving carbon targets. The publication of a final design for the support scheme is required to support the PfG target for increasing renewable electricity capacity.
- 3.6 The PfG also sets out that it will seek to achieve self-sufficiency in our own clean and affordable energy recognising the natural resources available including wind, biomethane and geothermal to break the link with global energy prices. This includes an ambition to become a net exporter of renewables and will unlock carbon emissions reduction and economic growth in NI.
- 3.7 The PfG also includes a commitment to develop the first Climate Action Plan for Northern Ireland, which is a requirement of the Climate Change Act. This was published in draft for public consultation in June 2025.

Draft Climate Action Plan

- 3.8 The Department of Agriculture, Environment and Rural Affairs (DAERA) published the Draft Northern Ireland Climate Action Plan 2023–2027 for public consultation. The Plan represents the first statutory Climate Action Plan prepared under the Climate Change Act (Northern Ireland) 2022 and establishes a comprehensive framework of policies and proposals to deliver emissions reductions across all sectors of the economy.

- 3.9 The Climate Action Plan introduces a legally binding framework for emissions reduction, including a requirement to achieve an average 33% reduction in greenhouse gas emissions over the 2023–2027 carbon budget period, forming a critical step on the pathway to achieving net zero by 2050.
- 3.10 In relation to the energy sector, the Plan confirms that renewable electricity generation is central to decarbonisation, stating that:
- “the main driver in the decarbonisation of the energy production and supply sector...has been the increase in the proportion of our energy produced from renewable sources”*
- 3.11 The Plan highlights that significant progress has already been achieved, with over 50% of electricity consumption generated from renewable sources, and confirms that this has been largely driven by wind energy, underlining its established role within Northern Ireland’s energy mix.
- 3.12 Notwithstanding this progress, the Climate Action Plan makes clear that substantial further deployment of renewable electricity generation is required, noting that:
- “deployment of new renewable electricity generation [is] required at scale with appropriate energy storage and decarbonised back-up solutions”.*
- 3.13 This establishes a clear policy requirement for the continued expansion of onshore wind and other renewable technologies at scale, recognising that such development is essential to meet legally binding emissions reduction targets and future electricity demand.
- 3.14 The Plan also recognises the importance of integrated and flexible energy systems, including storage, stating that:
- “policies to support new renewable generation that incorporates flexibility... will be necessary... to ensure security of supply”.*
- 3.15 This provides direct policy support for the co-location of renewable generation with technologies such as Battery Energy Storage Systems (BESS), which are required to manage intermittency, support grid stability and maximise the efficiency of renewable energy deployment.
- 3.16 Critically, the Plan acknowledges a recent slowdown in new renewable connections, noting that emissions reductions have “plateaued in recent years” due to limited new deployment.
- 3.17 This reinforces the urgent need for new renewable energy developments, particularly onshore wind, to deliver the scale of deployment required to meet statutory climate targets.

Northern Ireland Energy Strategy ‘The Path to Net Zero Energy’

- 3.18 In June 2019, the UK became the first major economy to commit to a 100 per cent reduction in greenhouse gas emissions by 2050. This 'net zero' target represents a significant step-change in the commitment to addressing the climate crisis.
- 3.19 The Northern Ireland Energy Strategy was published in December 2021 and set out an ambitious pathway to a decarbonised, affordable energy future for everyone in Northern Ireland. It envisages a future that ends price volatility associated with fossil fuels and ensures that more of the money spent on energy stays in the local economy, helping to create opportunities for jobs and wealth creation.
- 3.20 The strategy forms an important part of Northern Ireland's overall plan to addressing climate change. Part of the plan includes 'the Green Growth Strategy' which paves an ambitious pathway to decarbonising energy, demanding change and innovation whilst creating substantial opportunities – building on our unique strengths – for people and businesses to participate in and benefit from a low carbon economy.
- 3.21 The document recognises that achieving the vision will require substantial changes to our energy system, economy and society, which is not something that can be achieved by government and the energy industry alone. The document projects a collaborative approach, where every person and business play a role and commitment to achieving a cohesive goal.

Energy Strategy Action Plan 2025

- 3.22 The year '2025' is identified in the strategy as a major milestone in the Executive's advancement of Northern Ireland's ambition to achieve self-sufficiency in affordable renewable energy. The Strategy sets out the policy framework for delivering renewable energy and carbon emissions targets by 2030.
- 3.23 The Action Plan identifies four key strategic priorities for progressing the Energy Strategy and advance the delivery of the Energy Strategy targets which includes 80% of electricity consumption from renewable sources by 2030.
- 3.24 The four strategic priorities are:
- Accelerating the Delivery of Affordable Renewable Energy;
 - Electricity Grid to Support Delivery of the 80% Renewable Electricity Target by 2030;
 - Improving Energy Efficiency; and
 - Delivering for Citizens and Communities.
- 3.25 The delivery of the strategy also underpins the draft programme for commitment to 'Grow a Globally Competitive and Sustainable Economy.'
- 3.26 This Action Plan sets out that the delivery on 2030 targets and beyond will require cross-government and multi-stakeholder actions and will serve as a roadmap to give confidence to our commitment to drive change.

Shaping our Electricity Future (2021)

- 3.27 The EirGrid and SONI jointly published the Shaping Our Electricity Future Roadmap, which sets out system requirements to support 70% clean electricity by 2030. For Northern Ireland, the roadmap identifies a need for 1,300 MW of new electricity capacity. It also confirms that additional dispatchable capacity is required across Ireland and Northern Ireland to maintain secure transmission to 2030.

Northern Ireland Statistics and Research Agency (NISRA) Energy Consumption and Renewable Generation in Northern Ireland 2025

- 3.28 The Northern Ireland Statistics and Research Agency published the Energy Consumption and Renewable Electricity Generation Report in March 2026, presenting metered renewable electricity generation and electricity consumption data for Northern Ireland covering January 2025 to December 2025.
- 3.29 Renewable electricity generation for this period totalled approximately 4,073 GWh, equivalent to 47% of Gross Final Electricity Consumption (8,755 GWh). This represents an increase from approximately 44% in the preceding 12-month period (January 2024 to December 2024), demonstrating continued growth in renewable electricity contribution.
- 3.30 Total electricity generation during the period was approximately 8,178 GWh, of which 50% was derived from renewable sources and 50% from non-renewable sources. Wind energy remained the dominant source of renewable electricity, accounting for approximately 72% of renewable generation, and is derived predominantly from onshore wind development. Other renewable sources included bioenergy (20%), solar (6%) and smaller contributions from landfill gas and hydro/tidal generation.

4. Proposed Development

- 4.1 The proposal comprises the development of a wind farm consisting of nine three-bladed horizontal-axis wind turbines (previously 14), each with a maximum blade tip height of up to 180 metres, as shown in **Figure 4.1** below.

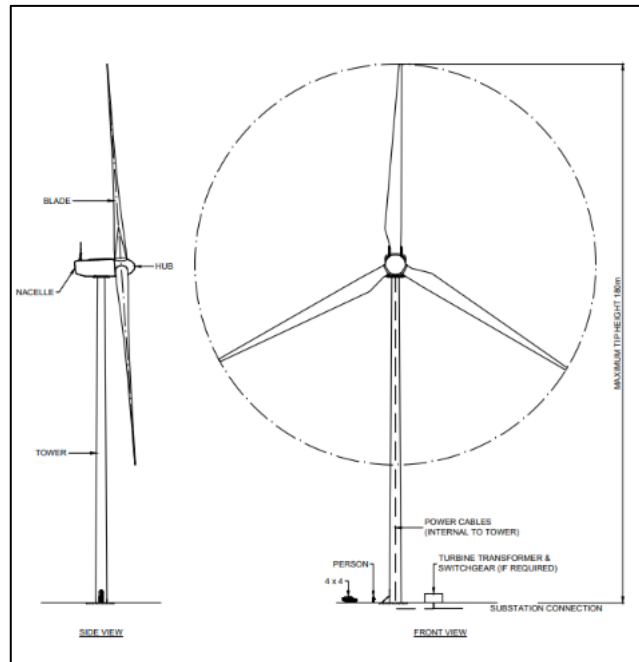


Figure 4.1: Extract of elevation of proposed wind turbine

- 4.2 The principal components of the development include:
- Wind turbines with associated external transformers;
 - A network of internal access tracks and turning heads;
 - Crane hardstanding at each turbine location;
 - A control building and substation compound;
 - Battery Energy Storage System (BESS) incorporating up to four containerised units;
 - Underground cabling linking turbines to the onsite substation compound;
 - Site entrance upgrades off the A42 Ballymena–Carnlough Road;
 - A temporary construction compound, laydown areas and welfare facilities; and
 - All ancillary works, including drainage infrastructure, forestry removal where required, and micro-siting allowances.

Site Layout

- 4.3 The site layout has therefore been revised as illustrated below in **Figure 4.2**. The revised layout includes the reduced turbine numbers and a reconfiguration of the layout across the site.

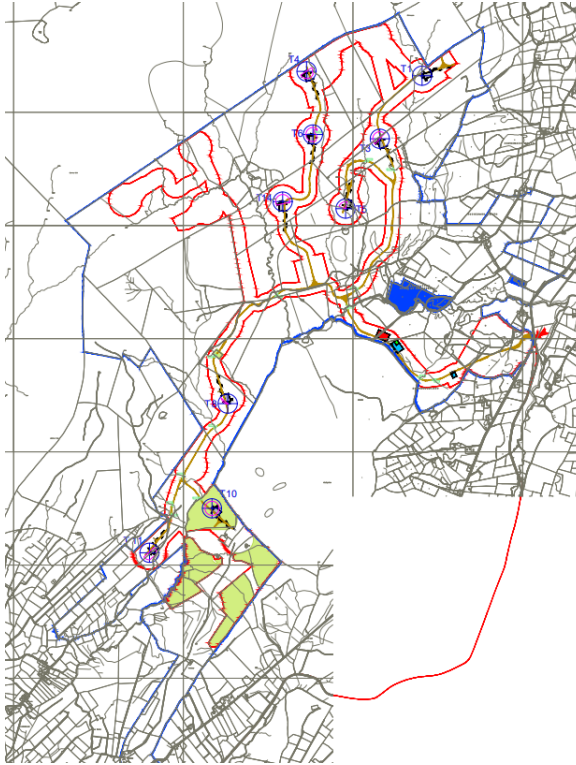


Figure 4.2: Revised Site Layout Plan

- 4.4 The revised layout includes the removal of turbines from the northern, western and peripheral extents of the site, resulting in a reduced spread of development across the site. The remaining turbines are more widely spaced, with increased separation distances between individual turbine locations.
- 4.5 The repositioning of turbines has resulted in changes to their relationship with surrounding environmental designations. In particular, the revised layout reduces the number of turbines located within the Eastern Garron Plateau and Scarp Slopes Area of Constraint on High Structures identified by the MEABC Plan Strategy.
- 4.6 The reconfiguration of turbines has also resulted in changes to the infrastructure network. These include:
- a reduction in the extent of internal access tracks;
 - the removal of track sections and crane hardstanding associated with omitted turbines;
 - a reduction in areas of forestry removal; and

- a more compact arrangement of construction and operational infrastructure.

Site Entrance and Access

- 4.7 Access to the site will be taken via a purpose-designed entrance on the A42 Ballymena to Carnlough Road, located approximately 150 m north of Doonan Leap Car Park. The access will accommodate all construction, abnormal load and operational traffic.
- 4.8 The internal road network will connect the entrance to all turbine locations, the substation compound, and temporary construction areas.
- 4.9 A combination of new and upgraded stoned tracks will provide access throughout the site. Track alignments are designed to:
- utilise existing agricultural and hill tracks where feasible;
 - minimise crossings of watercourses;
 - avoid areas of deep peat and sensitive habitats; and
 - ensure safe access for turbine component delivery and maintenance.
- 4.10 Tracks typically comprise a compacted stone surface engineered to support abnormal loads and long-term operational traffic.

Wind turbines with associated external transformers

- 4.11 The development comprises three-bladed, horizontal-axis wind turbines, each with a maximum tip height of up to 180 metres. Each turbine will be equipped with an external, pad-mounted transformer, positioned within a compact, weather-resistant enclosure at the turbine base. These transformers will convert the electricity generated by the turbines to the appropriate voltage for transmission via the underground cable network to the onsite substation.
- 4.12 The turbines will be constructed using modern, durable and industry-standard materials designed to ensure long-term structural integrity, efficient performance and minimal environmental impact. The turbine towers will comprise rolled and welded steel sections, protected by a specialist coating system. The nacelles will house generating components within composite cladding, and rotor blades will be formed from glass-fibre reinforced materials. Each turbine will be supported by a reinforced concrete foundation designed in accordance with site-specific ground conditions.
- 4.13 The external transformers will be housed within compact GRP or steel acoustic enclosures, designed to withstand environmental conditions and ensure safe, efficient operation, incorporating fire-resistant materials and spill-containment measures consistent with industry best practice.

Substation, Control Building and Energy Storage

- 4.14 A centralised substation and control building will be constructed on a suitable level platform within the site. This compound will house electrical switchgear, metering equipment, communication systems and operational facilities for the wind farm, as shown in **Figure 4.3** below.

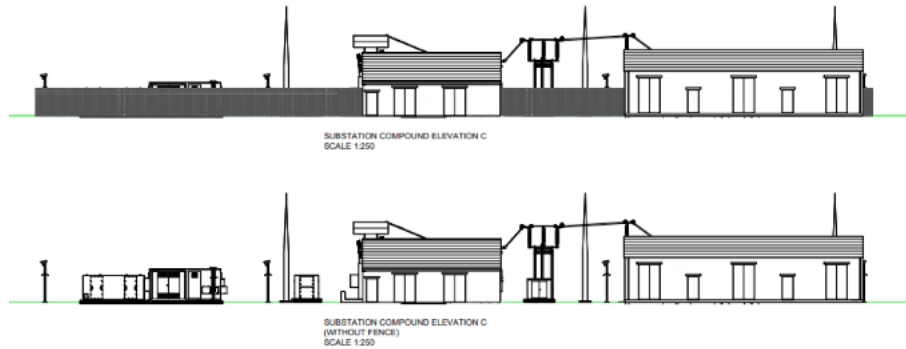


Figure 4.3: Proposed Elevations of Substation and Control Building

- 4.15 The development also includes a Battery Energy Storage System (BESS) comprising up to four containerised units positioned adjacent to the substation, as shown in **Figure 4.4** below. The BESS is co-located with the proposed wind farm and forms part of an integrated renewable energy development. The precise capacity of the BESS has not been fixed at this stage and will be determined at detailed design stage. The BESS will provide grid-support functionality, facilitating the efficient balancing and integration of renewable generation, optimising the use of grid infrastructure and supporting the management of intermittency in line with wider energy system needs.

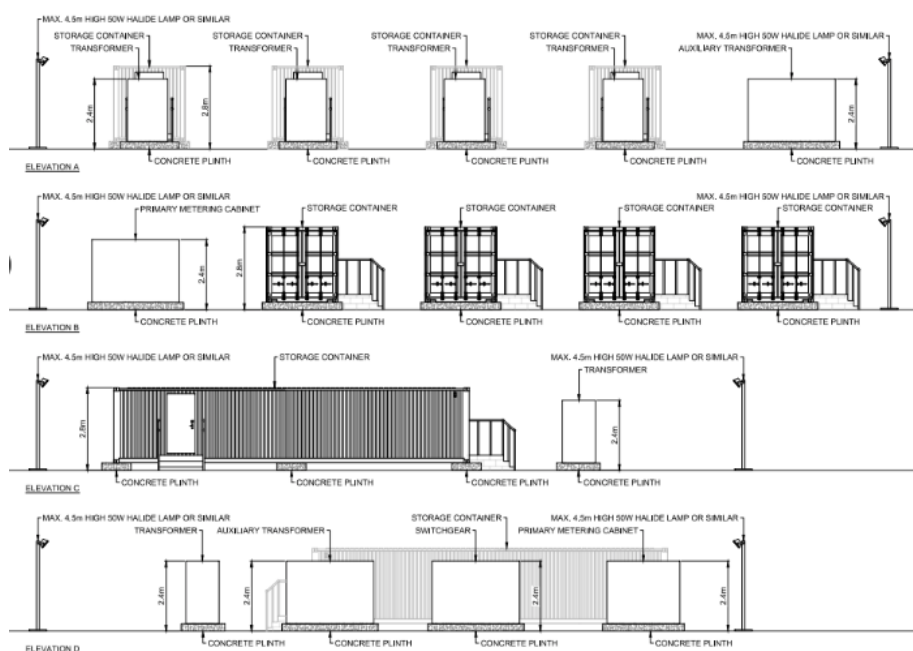


Figure 4.4: Proposed Elevation and Sections of Battery Energy Storage System

Underground Cabling and Grid Connection

- 4.16 Inter-turbine cabling and cabling to the onsite substation will be installed underground. Although the final grid connection works fall outside the scope of this planning application, the likely connection options either to the Kells or Ballymena substations have been identified, and indicative routing together with potential environmental considerations have been assessed. This approach ensures that the overall design acknowledges the wider grid context and that the onsite layout has been appropriately planned to accommodate the anticipated connection requirements.

Temporary Construction Works

- 4.17 During construction, a temporary construction compound will be established within the site to accommodate site offices, welfare units, secure storage, parking and laydown areas. Temporary crane pads will be formed at turbine locations for installation activities. Construction activities also include:
- temporary drainage measures and sediment control;
 - watercourse crossings; and
 - forestry removal or vegetation clearance where needed.

- 4.18 All temporary areas will be reinstated following construction unless operational requirements dictate retention (e.g., crane hardstanding).

Site Security

- 4.19 The development incorporates a range of measures to ensure the security, integrity and safe operation of the wind farm, substation, and battery energy storage infrastructure.
- 4.20 Security measures will be included at all permanent infrastructure, including the substation, control building and battery energy storage compound. These will include:
- Secure fencing to prevent unauthorised access;
 - Controlled, locked access gates;
 - CCTV coverage where appropriate; and
 - Operational access limited to authorised personnel only.

- 4.21 These provisions ensure the site remains secure throughout construction, operation and decommissioning.

Benefits

- 4.22 The proposed wind farm will have an installed generating capacity of approximately 37.8 MW (reduced from 58.8 MW in the original proposal). The development is expected to generate approximately 71 GWh of renewable electricity per annum,

which is sufficient to meet the average annual electricity demand of over 21,000 homes, equivalent to approximately one-third of the current housing stock in Mid and East Antrim.

- 4.23 The development will make a meaningful contribution at both the local and regional level to Northern Ireland's renewable energy supply and security of electricity provision. In doing so, it will support the delivery of statutory climate and energy objectives, including the target of achieving at least 80% of electricity consumption from renewable sources by 2030, and the longer-term transition to a net zero carbon economy.
- 4.24 The proposed development will also deliver:
- Capital investment of approximately £77 million.
 - Approximately £29 million of capital spend realised within the Northern Ireland economy.
 - Construction phase benefits of approximately 200 job years, £5.9 million in wages and £14.0 million in GVA.
 - Operational phase annual benefits of approximately 4 jobs, £110,000 in wages and £620,000 in GVA.
 - Approximately £2.5 million in construction-phase tax revenues.
 - Approximately £180,000 in annual operational tax revenues.
 - Over £375,000 in annual business rates.

5. Legislative & Planning Policy Context

- 5.1 This section provides the relevant legislative and planning policy considerations at both the regional and local level.

Legislative Context

The Planning Act (Northern Ireland) 2011

- 5.2 Section 6 (1) of the Planning Act (NI) 2011 (the Act) states that: -

‘any reference—

(a) to a local development plan in this Act and in any other statutory provision relating to planning; and

(a) to a local development plan in this Act and in any other statutory provision relating to planning; and

(b) to a development plan in any statutory provision relating to planning, is to be construed as a reference to the development plan documents (taken together) which have been adopted by the council or approved by the Department in accordance with section 16(6).’

- 5.3 Section 6 (4) of the Planning Act (Northern Ireland) 2011 (the Act) sets out the following requirement:

‘Where, in making any determination under this Act, regard is to be had to the local development plan, the determination must be made in accordance with the plan unless material considerations indicate otherwise.’

- 5.4 Section 6 (4) of the Act states: -

‘where in making any determination under this Act, regard is to be had to the local development plan, the determination must be made in accordance with the plan unless material considerations indicate otherwise.’

- 5.5 Section 45 (1) of the Act confirms that the starting point of reference for the determination of a planning application is the local development plan. Section 45 (1) goes on to say: -

‘where an application is made for planning permission, the Council or, as the case may be, the Department, in dealing with the application, must have regard to the local development plan, so far as material to the application, and to any other material considerations...’

Regional Development Strategy (RDS) 2035

- 5.6 The RDS 2035 provides strategic level policies to guide development in Northern Ireland up to 2035. It does not prescribe operational policy, which is the role of the Strategic Planning Policy Statement for Northern Ireland (SPPS) and the Local Development Plan (the Northern Area Plan 2016 in this instance). The RDS provides two forms of strategic guidance:
- **Regional Guidance (RG)** – this applies to everywhere within Northern Ireland and is presented under the three sustainable development themes of Economy, Society and Environment; and
 - **Spatial Framework Guidance (SFG)** – this is additional to the Northern Ireland wide guidance and is tailored to each of the five elements of the Spatial Framework.
- 5.7 Para 4.15 of the RDS states the development of Northern Ireland’s renewable energy sources is vital to increase its energy security, help combat climate change and achieve the renewable energy targets. This is likely to mean an increase in the number of wind farms both on and offshore and the need to diversify renewables to include electricity from other sources such as tidal stream and bio-energy sources. A renewable heat strategy is likely to require new renewable heat infrastructure to support it.
- 5.8 Para 4.16 goes on to state that to facilitate the provision of additional renewable power generation, we a need to address current areas of weakness in the grid, it will be necessary to strengthen the electricity grid in many parts of Northern Ireland.
- 5.9 Para 4.17 highlights the importance of increased electricity interconnection capacity. It states we will provide increased opportunities for competitive trading in wholesale electricity, encourage new investment in generation and supply and enhance Northern Ireland’s security of supply. It is also important to facilitate the growth in power generation from renewable sources, while managing the challenging network management issues that increasing amounts of renewable integration onto the grid brings.
- 5.10 **RG5 Deliver a Sustainable and Secure Energy Supply**, reiterates the importance of a robust and sustainable energy supply. It states that new generation or distribution infrastructure must be carefully planned and assessed to avoid adverse environmental effects, particularly on or near protected sites.
- 5.11 The key deliverables under RG5 are as follows:
- Increase the contribution that renewable energy can make to the overall energy mix. There will need to be a significant increase in all types of renewable electricity installations and renewable heat installations, including a wide range of renewable resources for electricity generation both onshore and offshore to meet the Region’s needs.
 - **Strengthen the grid:** With an increasing number of renewable electricity installations as well as increasing numbers of renewable heat installations we will need to strengthen the grid. It will be necessary to integrate heat and electricity

infrastructure (e.g. district heating networks and new electricity grid) alongside new road infrastructure development at the planning stage. If electric transport becomes more widespread, there will need to be a reliable recharging network. It also means increasing electricity interconnection capacity to strengthen the linkages between transmission and distribution networks.

- **Work with neighbours:** This will ensure a secure energy supply from competitive regional electricity markets in the EU's Internal Market.

- 5.12 **RG9 Reduce our Carbon Footprint and Facilitate Mitigation and Adaption to Climate Change whilst Improving Air Quality** sets out how consideration should be given to reducing energy consumption and moving to more sustainable methods of energy production.

Strategic Planning Policy Statement Northern Ireland Edition 2, 2025 (SPPS)

- 5.13 The 2nd Edition of the SPPS was published by the Department for Infrastructure (DfI) in December 2025 and introduced revised policy for renewable and low carbon energy. As a result, PPS18: Renewable Energy was cancelled. All other policy provisions with the SPPS are unchanged from the first version
- 5.14 The provisions of the SPPS apply to the whole of Northern Ireland and it is material to the determination of individual planning applications.
- 5.15 Furthering sustainable development is the cornerstone of the SPPS. The SPPS states that planning authorities should deliver on all three pillars of sustainable development including economic, social and environmental in determining planning applications.
- 5.16 Paragraph 1.10 of the SPPS states that a transitional period will operate until such times as a Plan Strategy for the whole of the council area has been adopted. During this transitional period planning authorities will continue to apply existing planning policies contained within the suite of Planning Policy Statements (PPSs) together with the subject policies of the SPPS.
- 5.17 Para 6.214 recognises the significant renewable energy resources and vibrant renewable industry in Northern Ireland, it's continuing important contribution towards furthering sustainable development, green growth and a significant provider of jobs and investment across the region.
- 5.18 Para 6.216 references that the renewable electricity consumption target set by the Climate Change Act.
- 5.19 Para 6.217 acknowledges how renewable and low carbon energy development reduces our dependence on imported fossil fuels and brings diversity and security of supply to our energy infrastructure.
- 5.20 Para 6.219 identifies the aim of the policy as being "to maximise sustainable renewable and low carbon energy from a wide range of technologies, at various scale, in appropriate locations within the built and natural environment, without compromising other environmental assets of acknowledged importance

5.21 The regional strategic objectives for renewable energy are:

- Ensure that sustainable renewable and low carbon energy development is facilitated at appropriate locations in order to increase the contribution to the transition to a net zero carbon economy, in accordance with the Climate change Act.
- Secure the delivery of an appropriate mix of energy provision that supports the Energy Strategy where this benefits our environment, economy and communities.
- Ensure that the environmental that the environmental, landscape, seascape, visual, safety and amenity impacts associated with or arising from renewable and low carbon energy development are appropriately assessed and addressed.
- ensure appropriate protection of the region's built, natural, and cultural heritage features.
- Facilitate the integration of renewable and low carbon energy technology into the design, siting, and layout of new development, and promote greater application of the principles of Passive Solar Design; and
- facilitate the appropriate onshore development required to enable offshore renewable and low carbon energy proposals.

5.22 Para 6.221 states that “in plan-making and decision-taking, planning must give appropriate weight to climate considerations (including the target to generate 80% of electricity consumption from renewable sources by 2030) and to supporting efforts to protect and enhance biodiversity. Planning authorities must help facilitate delivery of the necessary increase in appropriate renewable and low carbon energy developments (electricity and heat) so that the contribution of this sector to the transition to a net zero energy is optimised. This requires careful balancing of the local impacts with the wider environmental, economic, and social benefits. Moratoria on planning applications whilst LDPs are being prepared or updated are not appropriate.”

DfI correspondence to Council Chief Executives on Revisions to Regional Policy

5.23 In October 2025, DfI issued a letter to all Councils in relation to highlight the importance of considering the SPPS, and any revisions to it, during plan-making and decision-taking processes.

5.24 The correspondence was intended to serve as a helpful reminder on the respective roles the Department and councils and perform in supporting the effective and efficient operation of the two-tier planning system and meeting the legislative requirement to ‘take account of’ the regional policy framework in which planning authorities operate.

5.25 The correspondence stated that “Properly and faithfully taking account of the SPPS overall, including any revision to it is, therefore, essential to support achievement of regional planning objectives; the wider commitments and priorities of the Infrastructure Minister and Executive, and to ensure delivery of a cohesive planning framework across the region.

5.26 The correspondence re-affirmed that the SPPS, and any amendment to it is a material consideration which must be taken into account in decision-taking, recognising the

relevance and weight of all material consideration is a matter for the relevant planning authority.

Local Policy

Mid and East Antrim Borough Council Local Development Plan 2030 – Plan Strategy

5.27 The Mid and East Antrim Borough Council Plan Strategy was adopted on 16th October 2023 and means that the retained PPS's no longer apply within the Council area, in accordance with the transitional arrangements of the SPPS, Edition 2 (2025).

5.28 The following operational policies are relevant to the assessment of the proposed development:

- **Policy GP1** – General Policy for All Development
- **Policy RE1** – Renewable Energy Development
- **Policy CS1** – Sustainable Development in the Countryside
- **Policy CS3** – Areas of Constraint on High Structures
- **Policy CS5** – Antrim Coast and Glens Area of Outstanding Natural Beauty (AONB)
- **Policy NAT1** – European and Ramsar Sites – International
- **Policy NAT2** – Species Protected by Law
- **Policy NAT5** – Habitats, Species or Features of Natural Heritage Importance
- **Policy TOU1** – Safeguarding of Tourism Assets
- **Policy TR1** – Access to Public Roads
- **Policy TR6** – Parking and Servicing
- **Policy FRD1** – Development within Floodplains
- **Policy FRD2** – Protection of Flood Defence and Drainage Infrastructure
- **Policy FRD3** – Management of Surface Water Flood Risk
- **Policy FRD4** – Sustainable Drainage (SuDS)
- **Policy FRD5** – Artificial Modification of Watercourses
- **Policy HE1** – Archaeological Remains and their Settings.

5.29 Section 9.3 of the Plan Strategy sets out the core policies relating to Renewable Energy in the Borough. The Plan Strategy includes a generally supportive strategic approach to renewable energy. At paragraph 9.3.5, the policy aim is:

‘To facilitate renewable energy development in appropriate locations within our borough, whilst balancing the recognised benefits against any potential environmental or social impacts.’

5.30 It is noted that while regard will be given to the above policy aim, it does not represent the most up-to-date regional expression of planning policy for renewable and low carbon energy. As set out above, the current regional policy position is contained within the SPPS, Edition 2.

5.31 Accordingly, in addition to the MEABC Plan Strategy, the proposal should also be assessed having regard to the updated renewable and low carbon energy policy contained within the SPPS, Edition 2.

6. Summary of Notice of Opinion

- 6.1 A Notice of Opinion (NOP) to refuse planning permission was issued by DfI on 8 December 2023 (see **Appendix 1**).
- 6.2 The NOP included the following nine reasons for refusal, which can be summarised as follows:

- *Landscape and Visual Impact:* The scale and siting of the proposed turbines were considered to result in significant adverse landscape and visual effects within the Antrim Coast and Glens AONB, including unacceptable cumulative impacts with existing and approved wind farms.
- *Impact on Tourism Assets:* The development was considered likely to detract from the scenic qualities and tourism value of the surrounding area, including key viewpoints and the wider Causeway Coastal Route.
- *Effects on International and National Natural Heritage Interests:* The Department concluded that insufficient evidence had been provided to rule out adverse effects on the integrity of the Antrim Hills SPA, particularly in relation to hen harrier and merlin. Concerns also remained regarding impacts on priority habitats, peatland, hydrology and protected species.
- *Archaeological and Cultural Heritage Impacts:* The application was considered to lack adequate assessment of potential impacts on archaeological remains of regional significance and the archaeological potential of the site.
- *Noise Impacts on Residential Amenity:* The Department identified uncertainties in the operational noise assessment, including cumulative effects, and concluded that it had not been demonstrated that the development would avoid unacceptable impacts on residential amenity.
- *Shadow Flicker:* The assessment did not sufficiently demonstrate that shadow flicker effects at nearby receptors would be avoided or appropriately mitigated.
- *Hydrology, Peat and Water Environment:* The Department considered that potential impacts on hydrology, peatland and the surrounding water environment had not been fully addressed, including risks to sensitive wetland habitats.
- *Impact on Rural Character and Sensitive Landscapes:* The overall scale and prominence of the turbines were considered incompatible with the character of the surrounding rural landscape and contrary to policies controlling development in the countryside and within the AONB.
- *Traffic and Road Safety:* Concerns remained in relation abnormal load movements, access design and potential impacts on the safe operation of the public road network.

7. Planning Consideration

- 7.1 This section assesses the proposed development against the 2nd Edition of the SPPS, MEABC Plan Strategy policies and addresses the matters identified within the NOP issued by the Department.

Principle of Development

- 7.2 The aim of the 2nd Edition of the SPPS is to maximise sustainable renewable energy and low carbon from a wide range of technologies, at various scales.
- 7.3 The 2nd Edition of the SPPS places a stronger emphasis for decision makers when it comes to deciding on renewable energy development. The change in wording from 'facilitate' in the 1st Edition SPPS to 'maximise' in the 2nd Edition is a significant shift in policy direction.
- 7.4 The SPPS also requires planning authorities to give appropriate weight to climate considerations, including the target to generate 80% of electricity consumption from renewable sources by 2030. Planning authorities must also help facilitate delivery of the necessary increase in appropriate renewable and low carbon energy development so that the contribution of this sector is optimised. This requires careful balancing of the local impacts with the wider environmental, economic and social benefits.
- 7.5 This clearly identifies that there needs to be an increase in electricity consumption from renewable sources and that planning authorities have a role to play in achieving that increase. In doing so, they must optimise the contribution from the renewable sector.
- 7.6 The 2nd Edition also states at para. 6.2.2.2 Councils must set out policies and proposals in their LDPs to enable the plan area's optimum contribution to achieving the renewable energy targets to be realised. The MEABC Plan Strategy pre-dates the 2nd Edition of the SPPS and whilst it may reflect the climate change targets, the policy restrictions in place would not reflect a regional policy position of 'optimising' the contribution ahead of 2030.
- 7.7 The proposed development is located within the open countryside and is therefore subject to Policy CS1 of the Plan Strategy, which relates to sustainable development outside defined settlement limits. Policy CS1 confirms that renewable energy development will be supported in principle where proposals accord with both Policy RE1 and Policy GP1.
- 7.8 Policy GP1, which sets out the general policy for all Development, which supports sustainable development and avoids demonstrable harm to interests of acknowledged importance.
- 7.9 In accordance with Policy GP1 following factors have been considered for the proposed development:

- Design quality and respecting local character and distinctiveness;

- Safeguarding residential amenity;
- Access, Movement and Parking;
- Safety and the Safeguarding of Human Health and Wellbeing;
- Sustainable Development;
- Development in the Countryside; and
- Other Considerations.

- 7.10 Since preparation of the original ES, the proposed development has been amended. The FEI confirms that the turbine layout has been reduced and reconfigured, with a smaller development footprint, fewer turbines in sensitive locations, reduced infrastructure and updated environmental assessment material. This reduced layout represents mitigation by design and is relevant to the assessment of each of the criteria in Policy RE1 and Policy CS3.

Policy RE1 – Renewable Energy Development

- 7.11 Policy RE1 enables renewable energy proposals, including ancillary buildings and associated infrastructure, where they comply with the criteria set out below:

a) it will not have an unacceptable adverse impact on visual amenity or landscape character including the cumulative effect of development on the landscape;

- 7.12 Alongside criteria a) of Policy RE1 above, Policy GP1 requires that development proposals must be compatible with surrounding land uses and must not detract from visual amenity, landscape character, or local distinctiveness, including as a result of infrastructure or landscaping. Development must also protect residential amenity and safeguard heritage, ecological and sensitive landscape settings from significant, irreversible or unacceptable effects. For development in the countryside, Policy GP1 requires that development must not give rise to significant or unacceptable effects on landscape character, rural distinctiveness, or environmental quality. Policy CS5 seeks to avoid adverse impact on the landscape quality, distinctive character, heritage and wildlife of the Antrim Coast and Glens AONB which would prejudice its overall integrity.
- 7.13 The landscape and visual effects of the proposal have been assessed through Chapter 4 of the ES and the FEI LVIA Addendum. The original LVIA considered landscape character, visual amenity and cumulative effects across the 30km study area, including the Antrim Coast and Glens AONB, surrounding settlements, scenic routes, footpaths and other public viewpoints.
- 7.14 Chapter 4 of the ES identified that significant visual effects would arise at six of the twenty representative viewpoints: VP1, VP2, VP5, VP6, VP9 and VP12. The remaining representative viewpoints were assessed as not significant in visual terms.
- 7.15 Chapter 4 also assessed cumulative effects. The ES concluded that the overall magnitude of cumulative effects on landscape character would be medium and not significant overall. It also concluded that cumulative visual effects would be ‘medium’ in magnitude and ‘not significant’ overall, with significant cumulative visual effects limited to a small number of closer viewpoints.

- 7.16 The FEI LVIA Addendum updates the landscape and visual assessment for the amended layout. It confirms that revised ZTV mapping, updated cumulative baseline information, comparative ZTV material, updated cumulative ZTVs, and updated wirelines and photomontages for the 20 viewpoints have been prepared.
- 7.17 The amended layout reduces the spread of turbine development and associated infrastructure, including access tracks, crane hardstanding and forestry removal. It also reduces the number of turbines visible in a number of views and reduces the visual density of the turbine group. The proposal would therefore give rise to no greater landscape and visual effects than those assessed in the ES and, in several respects, materially reduced effects.
- 7.18 The proposed development comprises a renewable energy development with associated operational infrastructure, including turbines, access tracks, crane hardstanding areas, substation/control infrastructure, BESS and ancillary works. The arrangement is dictated by the functional requirements of the wind farm and has been informed by environmental and technical constraints.
- 7.19 The amended layout reduces the extent of development across the site, removes turbines from the northern, western and peripheral extents, increases visual separation between remaining turbines, and reduces internal access tracks, crane hardstanding areas, forestry removal and the overall infrastructure footprint. The layout also uses existing agricultural and hill tracks where feasible, minimises watercourse crossings, avoids areas of deep peat and sensitive habitats, and provides safe access for turbine delivery and maintenance.
- 7.20 On this basis, the general arrangement is a direct response to site constraints and represents mitigation by design for a renewable energy development. It is compatible with the rural context and does not result in demonstrable harm to interests of acknowledged importance.
- 7.21 The scale of the turbines is necessary to secure efficient renewable energy generation from the available wind resource. The amended development comprises nine turbines of up to 180m tip height, with an expected installed capacity of 37.8MW and a planned operational life of 30 years. The amended proposal has reduced turbine numbers from fourteen to nine, with a corresponding reduction in the spread of development and infrastructure footprint, whilst retaining a viable renewable energy project.
- 7.22 The site is located within the Antrim Coast and Glens AONB. Regard has been had to the Antrim Coast and Glens AONB Action Plan 2021–2025, which seeks to conserve and protect the landscape character, natural and historic environment of the AONB, while encouraging sustainable and appropriate development, access and enjoyment. In addition, Policy CS5 does not preclude development in the AONB.
- 7.23 The amended development reduces the scale, extent and infrastructure footprint of the development. While the proposal will remain visible from parts of the AONB, the reduced layout materially lessens landscape and visual effects and would not compromise the overall integrity of the AONB, including its landscape, heritage and wildlife interests.

- 7.24 Criteria (f) of Policy GP1 requires that development in the countryside must not give rise to significant or unacceptable effects on landscape character, rural distinctiveness, or environmental quality. Proposals must demonstrate sensitive siting and proportionate design, including appropriate scale, height and massing, while securing integration primarily through established natural boundaries, avoiding reliance on substantial new landscaping or earthworks. Development must also safeguard the visual and spatial distinction between settlements and open countryside.
- 7.25 The amended layout creates a more compact arrangement and reduces the extent of development across the site. It has been informed by environmental and technical constraints and reduces the spread of turbine development and associated infrastructure. These changes also reduce the potential for cumulative landscape and visual effects.
- 7.26 Visual impact is a local impact that must be assessed in the planning balance against the environmental, economic and social benefits. There were significant effects identified at less than one third of the viewpoints assessed in the ES. The FEI LVIA has identified that there are no greater visual effects from the identified viewpoints within the landscape assessment.
- 7.27 While landscape and visual change will occur, this is to be expected for wind farm development and explains the need for reaching a balanced decision. Policy RE1 recognises that some degree of impact will be unavoidable with wind energy proposals. This proposal has seen a reduction in visual impact through the amended layout, demonstrating a willingness to lessen the potential impacts whilst still maintaining a viable development.
- 7.28 While landscape and visual change will occur, the amended proposal is not considered to result in an unacceptable adverse impact on visual amenity or landscape character, including cumulative landscape effects. The consideration of landscape impact in this location must be considered in the overall planning balance when reaching a decision on this application, taking account of other relevant considerations and the SPPS. The matter of visual impact is considered further at the conclusion of this section of the statement.
- b) it will not cause significant harm to the safety or amenity of any sensitive receptors (including future occupants of committed developments) arising from noise; shadow flicker; ice throw; and reflected light;*
- 7.29 Alongside criteria b) of Policy RE1, Policy GP1 criteria (b) requires that development, including built form and associated use, must not cause unacceptable or significant adverse effects on the amenity of residents within, adjacent to, or in reasonable proximity to the site. New high structures must also maintain adequate separation from existing or approved infrastructure where amenity, safety or public protection could otherwise be compromised. Policy GP1 criteria (d) requires development proposals not to compromise safety or cause demonstrable harm to human health or wellbeing, including through unacceptable impacts from noise, artificial lighting, pollution, contamination or hazardous substances.

- 7.30 The NOP identified uncertainties in the operational noise assessment, including cumulative effects, and concluded that it had not been demonstrated that the development would avoid unacceptable impacts on residential amenity. The NOP also stated that the assessment did not sufficiently demonstrate that shadow flicker effects at nearby receptors would be avoided or appropriately mitigated.
- 7.31 The ES assessed potential effects on sensitive receptors arising from operational noise, construction noise, shadow flicker, ice throw and reflected light. Chapter 10 of the ES assessed construction, operational and cumulative noise. Chapter 10 of the ES and the updated FEI Acoustic Assessment conclude that predicted operational noise levels at all residential properties do not exceed the relevant ETSU-R-97 derived limits. Construction noise would be temporary and capable of control through established construction management measures.
- 7.32 The amended layout reduces the number of operational turbine noise sources and would give rise to no greater noise effects than those assessed in the ES. The proposal would not result in unacceptable noise impacts on residential amenity or human health.
- 7.33 The ES also assessed shadow flicker, reflected light and ice throw and concluded that these effects could be appropriately controlled. The amended layout reduces the number of turbine sources with potential to affect residential receptors and would give rise to no greater amenity effects than those assessed in the ES.
- 7.34 Residential separation has been a key design consideration from the outset. The ES confirms that the layout was informed by a 1,000m separation from housing, described as double the minimum 500m separation distance. The turbines were also sited to ensure compliance with relevant noise criteria and to minimise shadow flicker effects. For a 136m rotor diameter turbine, the 10-times rotor diameter guideline equates to 1,360m. With the 50m micro-siting allowance, this gives a reference distance of 1,410m. No residential property is located within the minimum 500m separation distance.
- 7.35 The amended layout further reduces the number of turbine sources with potential to affect residential receptors. This separation, together with the amended and reduced layout, is relevant to the assessment of residential amenity, safety and public protection. Having regard to the separation distances, the ES amenity conclusions and the reduced turbine layout, the proposal satisfies the residential separation requirements of Policy RE1.
- 7.36 The proposal is located in an upland rural context and operational lighting would be limited to that required for safe access, security and operational purposes. Security measures will be included at all permanent infrastructure, including the substation, control building and battery energy storage compound. These measures include secure fencing, controlled locked access gates, CCTV coverage where appropriate and operational access limited to authorised personnel only. Any operational lighting can be controlled through detailed design and planning condition to ensure that light spill is minimised and that lighting remains appropriate to the rural location, nearby receptors and nature conservation interests.

- 7.37 Pollution prevention and hazardous substance risks have been considered through the ES water environment and drainage assessment and the design of the proposed infrastructure. The ES identifies mitigation including SuDS, silt management, watercourse buffers, construction-phase pollution prevention procedures and water quality monitoring. The external transformers will be housed within compact GRP or steel acoustic enclosures designed to withstand environmental conditions and ensure safe, efficient operation, incorporating fire-resistant materials and spill-containment measures consistent with industry best practice.
- 7.38 The BESS is located adjacent to the substation as part of the integrated renewable energy development and will be subject to detailed design, operational safety, containment and management controls. During construction, potential pollution risks would be managed through construction management measures, temporary drainage measures, sediment control, pollution prevention procedures and reinstatement of temporary construction areas following completion.
- 7.39 Taking these matters together, the proposal would not cause significant harm to the safety or amenity of any sensitive receptors arising from noise, shadow flicker, ice throw or reflected light. It would not cause unacceptable or significant adverse effects on residential amenity, safety, human health or wellbeing, including through noise, artificial lighting, pollution, contamination or hazardous substances. The proposal therefore satisfies Policy RE1 criteria (b), Policy GP1 criteria (b), and the relevant amenity, safety, human health and wellbeing requirements of Policy GP1 criteria (d).
- c) it will not unacceptably restrict public access to the countryside or coast, or recreational/tourist use of the area;*
- 7.40 Policy RE1 criteria (c) requires renewable energy development to demonstrate that it will not unacceptably restrict public access to the countryside or coast, or recreation and tourism use of the area. Policy TOU1 directs that planning permission will only be supported where development, either individually or cumulatively, does not result in adverse impacts that would materially harm or unacceptably compromise the amenity, setting, or tourism value of recognised tourism assets. The policy requires that proposals safeguard asset character, local context, and visitor experience, ensuring tourism value and the wider place setting are appropriately conserved in the planning balance. Policy GP1 criteria (c) requires that access and movement design must protect public rights of way and prioritise walking, cycling and inclusive mobility.
- 7.41 The NOP identified concern that the development was considered likely to detract from the scenic qualities and tourism value of the surrounding area, including key viewpoints and the wider Causeway Coastal Route.
- 7.42 The ES and supporting tourism information considered tourism and recreation receptors, including the Causeway Coastal Route, Carnlough, Glenariff Forest Park, Cranny Falls, Slemish, the Antrim Hills Way and the Ulster Way. The FEI Landscape and Visual Impact Assessment Addendum confirms that the reduced layout has been assessed using updated visibility mapping, cumulative baseline information, comparative visibility mapping, wirelines and photomontages for the 20 viewpoints. It also confirms that the amended layout reduces the number and spread of turbines and updates the cumulative baseline for the revised scheme.

- 7.43 The updated landscape maps identify the proposal in relation to scenic drives, footpaths, National Cycle Network routes, visitor attractions and destinations including Glenarm Castle and Demesne, Glenariff Forest Park, Cranny Falls, Garron Point, the Causeway Coastal Route and the Antrim Hills Way. The amended layout reduces the physical and visual spread of the wind farm and associated infrastructure. While the turbines will remain visible from some recreational and tourism locations, the reduced layout materially lessens the level of visual change compared with the original proposal.
- 7.44 The PAC Report¹ into Doraville windfarm confirms that tourism impact is not assessed in the abstract, nor on the basis that wind energy development is automatically incompatible with an AONB or tourism area. Impact on tourism be based on specific, evidenced impacts on identified tourism assets, rather than the mere presence of turbines in a sensitive rural landscape.
- 7.45 The amendments to the layout have been undertaken to address the landscape, visual and rural character concerns that underpinned the previous tourism reason for refusal. The amended scheme reduces the number and extent of the turbines, reduces the associated infrastructure footprint, and materially reduces the potential effects. Although cumulative wind farm development can influence visitor perception, the available tourism evidence does not indicate that wind farm visibility alone gives rise to unacceptable tourism effects.
- 7.46 There is no evidence that the proposal would prevent access to tourism assets, sever or restrict recreational routes, materially affect the operation of tourism facilities, or deter visitors from using the Causeway Coastal Route, Carnlough, Glenarm, Glenariff Forest Park or the wider AONB tourism resource. The proposal would not restrict public access to the countryside or coast, nor would it unacceptably affect recreational or tourist use of the area. Operational traffic will be limited, with parking and servicing accommodated within the site. Construction-phase parking will be provided within the temporary construction compound. The proposal does not remove or restrict any public right of way.
- 7.47 Furthermore, the updated socioeconomic assessment also notes that professional and academic research has not provided definitive evidence that wind farm development is harmful to tourism. This includes Scottish research² which found no evidence of a relationship between tourism employment and wind farm development at the national, local authority or wind farm locality level. This is also consistent with Scottish Government³ and ClimateXChange⁴ research, which found no robust evidence of a serious or discernible negative economic impact on tourism. Visitor-attitude evidence

¹ PAC Ref: 2018/C007

² [BiGGAR Economics, Wind Farms & Tourism Trends in Scotland: Evidence from 44 Wind Farms \(2021\)](#)

³ [Scottish Government / Glasgow Caledonian University Moffat Centre, The Economic Impacts of Wind Farms on Scottish Tourism \(2008\)](#)

⁴ [ClimateXChange, The Impact of Wind Farms on Scottish Tourism \(2012\)](#)

from Ireland⁵ similarly indicates that wind farm visibility does not, in itself, translate into adverse tourism effects for the majority of visitors.

- 7.48 Accordingly, while the proposal will remain visible from parts of the surrounding landscape, visibility alone does not amount to a significant compromise of tourism value. The amended layout materially reduces the effects that informed the previous tourism concern and would not significantly compromise the amenity, setting or tourism value of identified tourism assets. It would not prevent access to tourism assets, sever or restrict recreational routes, affect the operation of tourism facilities, materially deter use of the wider tourism resource, or unacceptably restrict public access to the countryside or coast.
- 7.49 The proposal therefore satisfies Policy RE1 criteria (c), Policy TOU1 and the relevant public access and movement requirements of Policy GP1 criteria (c).
- d) no part of it will have an unacceptable impact on roads, rail or aviation safety;*
- 7.50 Policy RE1 criteria (d) requires renewable energy development to demonstrate that no part of the development will have an unacceptable impact on roads, rail or aviation safety. Policy GP1 criteria (c) requires that development access and movement design must accord with the latest guidance issued by the Department for Infrastructure, ensuring safe junction layout, visibility and highway standards. Proposals must also prioritise walking, cycling and inclusive mobility, protect public rights of way, and provide convenient connectivity to public transport and community facilities. Policy TR1 permits development access onto a public road only where road safety is maintained and traffic movement is not significantly hindered or inconvenienced. The siting and number of access points must be assessed against current and forecast traffic volumes, site context and network capacity. Policy TR6 requires development proposals to provide adequate and policy-compliant parking and servicing arrangements, safeguarding road safety and preventing unacceptable obstruction to people or goods movement.
- 7.51 The NOP identified concerns in relation to abnormal load movements, access design and potential impacts on the safe operation of the public road network.
- 7.52 Chapter 11 of the ES assessed traffic and transport effects, including construction traffic, HGV movements, abnormal indivisible loads and access arrangements. The principal transport effects would arise during the construction phase, particularly from turbine component delivery and construction traffic. Operational traffic is expected to be minimal and would mainly comprise routine servicing and maintenance visits.
- 7.53 The ES concludes that, taking into account existing vehicle movements on the affected roads and the proposed type and frequency of construction traffic, there would be no significant traffic impacts with the proposed mitigation measures in place.
- 7.54 Access will be taken from the A42 Ballymena/Carnlough Road via a purpose-designed entrance north of the Slane Road junction. The entrance provides visibility splays of

⁵ [Fáilte Ireland, Visitor Attitudes on the Environment: Wind Farms \(2008\)](#)

160m x 4.5m in both directions and has been designed to accommodate construction, abnormal load and operational traffic.

- 7.55 The access is located approximately 150m north of Doonan Leap Car Park and will accommodate all construction, abnormal load and operational traffic. The design of the junction, including visibility splays, approach gradients and turning geometry, will comply with the appropriate road standards.
- 7.56 The internal road network will connect the entrance to all turbine locations, the substation compound and temporary construction areas. A combination of new and upgraded stoned tracks will provide access throughout the site. Track alignments are designed to utilise existing agricultural and hill tracks where feasible, minimise crossings of watercourses, avoid areas of deep peat and sensitive habitats, and ensure safe access for turbine component delivery and maintenance.
- 7.57 DfI Roads commented on the original proposal and was content with it in principle, subject to the resolution of technical matters including scaled plans and surveys for site access works, abnormal load delivery details, engineering works at The Sheddings and swept path analysis. These matters have been addressed as part of the amended proposal and updated transport/access information.
- 7.58 The reduction in turbine numbers as part of the development reduces turbine component deliveries, abnormal load movements and related construction traffic. It also reduces the extent of internal access tracks, removes track sections and crane hardstanding associated with omitted turbines, and provides a more compact arrangement of construction and operational infrastructure.
- 7.59 Operational traffic for the development will be limited, with parking and servicing accommodated within the site. Construction-phase parking will be provided within the temporary construction compound. The proposal does not remove or restrict any public right of way.
- 7.60 In relation to aviation safety, Belfast International Airport, George Best Belfast City Airport, NATS, DIO LMS & Safeguarding, and the CAA Safety and Airspace Regulation Group all responded to the original proposal with no objection subject to conditions, confirming no in-principle aviation safety objection.
- 7.61 Taking these matters together, the proposal would not have an unacceptable impact on roads, rail or aviation safety. The access, parking and servicing arrangements are safe, appropriate to the nature of the development and would not give rise to unacceptable impacts on road safety, traffic movement or local amenity. The proposal therefore satisfies Policy RE1 criteria (d), Policy GP1 criteria (c), Policy TR1 and Policy TR6.

e) it will not have an unacceptable adverse impact on built heritage or on biodiversity or nature conservation (including cumulative effects);

- 7.62 Alongside criteria e) of Policy RE1, Policy GP1 criteria (a) requires development proposals to be compatible with their setting and not detract from visual amenity, landscape character, local distinctiveness, environmental quality or heritage and

ecological interests. Policy NAT1 requires that development must not, alone or cumulatively with other plans or projects, be likely to cause significant effects on European or listed/proposed Ramsar sites, unless integrity is protected and all mitigation and compensation is secured by condition or agreement. Policy NAT2 relates to species protected by law, Policy NAT5 relates to habitats, species or features of natural heritage importance, and Policy HE1 relates to archaeological remains and their settings. Policy CS5 is also relevant insofar as the AONB includes landscape, heritage and wildlife interests which must not be compromised.

- 7.63 Concerns were raised regarding effects on international and national natural heritage interests, including whether sufficient evidence had been provided to rule out adverse effects on the integrity of the Antrim Hills SPA, particularly in relation to hen harrier and merlin. Concerns also remained regarding priority habitats, peatland, hydrology and protected species. The NOP also raised concerns that the application lacked adequate assessment of potential impacts on archaeological remains of regional significance and the archaeological potential of the site.
- 7.64 The ES assessed potential effects on built heritage, archaeology, ecology, ornithology, fisheries, geology and the water environment. It identified baseline conditions and assessed effects on designated and non-designated heritage and natural heritage receptors, including cumulative effects where relevant.
- 7.65 Further cultural heritage assessment has been undertaken through the FEI. The FEI Archaeology and Cultural Heritage chapter confirms that it was prepared to assess the reduced turbine layout and address HED comments. It is supported by further baseline information, including LiDAR assessment, field walkover survey and additional heritage visualisations requested by HED.
- 7.66 The development footprint has been reduced and turbines 2, 7, 9, 12 and 13 have been removed in response to impacts identified through the ES, further investigations within the site and consultation. The amended layout therefore responds directly to heritage, archaeological, ecological and ornithological concerns through mitigation by design.
- 7.67 In heritage terms, the FEI concludes that, in most cases, indirect setting effects would be no more than 'slight adverse' and in no instance higher than 'minor adverse'. It also concludes that, in all cases, the development would not directly affect a key aspect of the significance of the assessed assets or the integrity of their settings. In cumulative terms, the FEI concludes that when considered with other developments it would not result in a materially higher level of effect on identified heritage assets than the development on its own.
- 7.68 In respect of biodiversity and nature conservation, the ES considered habitats and protected species, including bats, otters, badgers, common lizard, smooth newt, red squirrel, pine marten, marsh fritillary butterfly and argemone and silver moth. Ornithological interests were also assessed, including hen harrier, merlin, curlew, snipe and other bird species associated with the upland landscape.
- 7.69 The updated ornithology information records that NED Ornithology are content with the breeding bird survey methodology, raptor surveys for the study area and collision risk assessment, including the conclusion that predicted collision rates are unlikely to

cause a significant adverse effect on local raptor populations, including hen harrier. Further breeding wader survey work was also undertaken, with the 2023 and 2024 surveys indicating a current curlew population of four or five pairs within 1km of the site.

- 7.70 The amended layout remains outside the Antrim Hills SPA, although the SPA adjoins the site boundary. The updated ornithology information confirms that the four turbines previously located within the Antrim Hills SPA have been removed, together with a further turbine elsewhere in the layout. The updated ornithological evidence also concludes that significant adverse effects on merlin are unlikely and that predicted collision rates are not expected to result in significant adverse effects on local raptor populations, including hen harrier.
- 7.71 The amended layout also removes turbines from sensitive locations and reduces tracks, hardstanding areas and forestry removal. The reduction in the development footprint, the removal of turbines from sensitive locations, and the reduction in associated infrastructure reduce the potential for effects on heritage, biodiversity and nature conservation receptors. The proposal will therefore give rise to no greater effects than those previously assessed and, in several respects, reduced effects.
- 7.72 Having regard to the amended layout and proposed mitigation, the proposal would not adversely affect the integrity of any European site, either alone or in combination with other plans or projects. The proposal would not result in unacceptable adverse effects on species protected by law, habitats, species or features of natural heritage importance, or archaeological remains and their settings.
- 7.73 Taking these matters together, the proposal would not have an unacceptable adverse impact on built heritage, archaeology, biodiversity or nature conservation, including cumulative effects. It would also not compromise the heritage or wildlife interests of the Antrim Coast and Glens AONB. The proposal therefore satisfies Policy RE1 criteria (e), Policy GP1 criteria (a), Policy NAT1, Policy NAT2, Policy NAT5, Policy HE1 and the relevant heritage and wildlife requirements of Policy CS5.

f) it avoids active peatland, unless it is demonstrated there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 as amended;

- 7.74 The Policy RE1 criteria (f) requires renewable energy development to demonstrate that active peatland is avoided, unless there are imperative reasons of overriding public interest. Policy RE1 criterion (j) requires that wind energy development will not create a significant risk of landslide or bog burst. Policy GP1 criteria (d) requires development proposals not to compromise safety or cause demonstrable harm to human health or wellbeing.
- 7.75 Concerns were raised about potential impacts on hydrology, peatland and the surrounding water environment had not been fully addressed, including risks to sensitive wetland habitats.
- 7.76 The ES included peat stability and peat management assessment. It identified control measures to manage peat slide risk during construction and operation, including

further investigation, appropriate siting of stockpiles, drainage control, construction management and monitoring.

- 7.77 The amended layout has reduced the development footprint and associated infrastructure. The proposal has been reduced from 14 turbines to 9 turbines, with the removal of turbines from the northern, western and peripheral extents of the site. The reconfiguration of turbines has also resulted in a reduction in the extent of internal access tracks, the removal of track sections and crane hardstanding associated with omitted turbines, a reduction in areas of forestry removal, and a more compact arrangement of construction and operational infrastructure.
- 7.78 The internal track alignments have been designed to utilise existing agricultural and hill tracks where feasible, minimise crossings of watercourses, avoid areas of deep peat and sensitive habitats, and ensure safe access for turbine component delivery and maintenance. The amended proposal therefore reduces excavation, hardstanding and track length, and consequently reduces peat and slope stability risk.
- 7.79 Chapter 9 of the ES confirms that effects on the geological and water environment can be controlled through design measures, SuDS, pollution prevention, construction controls and monitoring, with residual effects reduced to not significant. Surface water management has also been addressed through the ES drainage strategy, including SuDS, silt control, pollution prevention and water quality monitoring.
- 7.80 Taking account of the amended layout, reduced infrastructure, reduced excavation, reduced hardstanding and track length, avoidance of areas of deep peat and sensitive habitats where feasible, and the identified peat stability and construction control measures, the proposal would avoid unacceptable effects on active peatland and would not create a significant risk of landslide or bog burst.
- 7.81 The proposal therefore satisfies Policy RE1 criteria (f), Policy RE1 criteria (j), and the relevant safety, human health and wellbeing requirements of Policy GP1 criteria (d).

g) it will not have an unacceptable adverse impact on local natural resources such as air quality, water quality and quantity; and

- 7.82 Alongside criteria (g) of Policy RE1, Policy GP1 criteria (d) requires development proposals not to compromise safety or cause demonstrable harm to human health or wellbeing, including as a result of environmental risk. Policy GP1 criteria (e) requires major development to confirm that all enabling infrastructure is available or supported by a firm commitment to timely delivery, to manage surface water sustainably, to prioritise the use of Sustainable Drainage Systems where feasible, to avoid unacceptable environmental or biodiversity impacts, and to incorporate appropriate measures for resource efficiency and waste storage.
- 7.83 Policy FRD1 relates to development within floodplains, Policy FRD2 seeks to protect flood defence and drainage infrastructure, Policy FRD3 addresses the management of surface water flood risk, and Policy FRD4 requires drainage assessments to incorporate a sustainable drainage strategy utilising appropriate SuDS measures where practicable.

- 7.84 The NOP identified concerns that potential impacts on hydrology, peatland and the surrounding water environment had not been fully addressed, including risks to sensitive wetland habitats.
- 7.85 Chapter 9 of the ES assessed potential effects on geology and the water environment, including hydrology, hydrogeology, water quality, fisheries and aquatic habitats. The ES identifies mitigation including avoidance of significant water features, watercourse buffers, SuDS, silt management and construction-phase pollution prevention procedures. It concludes that implementation of the proposed mitigation would reduce effects on receptors to not significant and that significant cumulative impacts are unlikely.
- 7.86 The amended layout reduces the construction footprint, access track length, hardstanding and watercourse interaction. The reconfiguration of turbines has resulted in a reduction in the extent of internal access tracks, the removal of track sections and crane hardstanding associated with omitted turbines, a reduction in areas of forestry removal and a more compact arrangement of construction and operational infrastructure.
- 7.87 Track alignments have been designed to utilise existing agricultural and hill tracks where feasible, minimise crossings of watercourses, avoid areas of deep peat and sensitive habitats, and ensure safe access for turbine component delivery and maintenance. This reduces the potential for effects on water quality, water quantity, hydrology, fish and aquatic habitats.
- 7.88 Surface water management has been addressed through the ES drainage strategy, including SuDS, silt control, pollution prevention and water quality monitoring. The amended layout reduces infrastructure, hardstanding and watercourse interaction, further reducing drainage and environmental effects.
- 7.89 The proposal would not compromise flood defence or drainage infrastructure, nor would it increase flood risk elsewhere. It would manage surface water sustainably, avoid unacceptable environmental impacts and provide the necessary infrastructure to deliver renewable energy generation.
- 7.90 Policy FRD5 relates to the artificial modification of watercourses. The amended layout and track design seek to minimise watercourse crossings, and surface water management has been addressed through the ES drainage strategy, including SuDS, silt control, pollution prevention and water quality monitoring. Where watercourse crossings or drainage works are required, these would be controlled through detailed design, construction management and relevant consents. The proposal would therefore not give rise to unacceptable effects arising from artificial modification of watercourses and would satisfy Policy FRD5.
- 7.91 The proposal would not have an unacceptable impact on water quality or quantity, fish or aquatic habitats. It would not compromise safety or cause demonstrable harm to human health or wellbeing through flood risk, drainage or water environment effects. It would manage surface water sustainably, avoid unacceptable environmental or biodiversity impacts, and would not compromise flood defence or drainage infrastructure or increase flood risk elsewhere. The proposal therefore satisfies Policy

RE1 criteria (g), Policy GP1 criteria (d) and (e), and Policies FRD1, FRD2, FRD3, FRD4 and FRD5.

h) it will not prejudice the operational effectiveness of existing or approved energy infrastructure.

- 7.92 The ES explains that the development includes onsite electrical infrastructure, underground cabling, a control building and substation compound, and battery energy storage. The BESS is identified as supporting grid operation by storing electricity and providing flexibility to the electricity network.
- 7.93 The amended proposal retains the BESS as part of an integrated renewable energy development. It will provide grid-support functionality, assist the balancing and integration of renewable generation, optimise grid infrastructure and support management of intermittency. The updated socioeconomic report also notes that energy storage can help mitigate short-term variability and improve alignment between generation and demand.
- 7.94 There is no evidence that the proposal would prejudice the operational effectiveness of existing or approved energy infrastructure. Rather, it would contribute positively to renewable generation, grid flexibility and electricity system stability. Criteria h) is met.
- 7.95 In regard to Wind Energy, Policy RE1 requires development proposals to comply with the following criteria:
- i) The development proposal has taken into consideration the cumulative impact of existing wind turbines, including extant permissions and undetermined applications;*
- 7.96 The ES assessed cumulative wind energy effects, including existing, consented and proposed wind farms in the wider area. The cumulative assessment considered whether the development would be experienced in combination with other wind energy development in the wider landscape.
- 7.97 Chapter 4 of the ES concludes that the overall magnitude of cumulative effects on landscape character would be medium and not significant overall. It also concluded that cumulative visual effects would be 'medium' and 'not significant' overall, with significant cumulative visual effects limited to a small number of viewpoints closer to the site.
- 7.98 The FEI LVIA Addendum confirms that the cumulative baseline has been updated and that updated cumulative ZTV diagrams, wirelines and photomontages have been prepared to reflect the amended layout and current cumulative baseline.
- 7.99 In ornithological terms, the updated ornithology material records that predicted collision rates are unlikely to cause significant adverse effects on local raptor populations, including hen harrier.
- 7.100 The reduced layout lessens the horizontal spread and infrastructure footprint of the proposal, thereby reducing the potential for cumulative landscape, visual, noise,

ecological and ornithological effects. The proposal has therefore taken account of existing turbines, extant permissions and undetermined applications. Criteria i) is met.

j) The development will not create a significant risk of landslide or bog burst; and

- 7.101 The ES included peat stability and peat management assessment. It identified control measures to manage peat slide risk during construction and operation, including further investigation, appropriate siting of stockpiles, drainage control, construction management and monitoring.
- 7.102 The amended scheme reduces excavation, hardstanding and track length, and therefore reduces peat and slope stability risk. Chapter 9 of the ES also confirms that effects on the geological and water environment can be controlled through design measures, SuDS, pollution prevention, construction controls and monitoring, with residual effects reduced to not significant.
- 7.103 The proposal would not create a significant risk of landslide or bog burst and criteria j) is met.

k) No part of the development will give rise to unacceptable electromagnetic interference to communications installations; radar or air traffic control systems; emergency services communications; or other telecommunication systems.

- 7.104 Alongside criteria k) of Policy RE1, Policy GP1 criteria (d) requires development proposals not to compromise safety or cause demonstrable harm to human health or wellbeing.
- 7.105 The ES assessed potential effects on telecommunications, aviation and radar interests. Relevant consultees were consulted on the original proposal, including Belfast International Airport, George Best Belfast City Airport, NATS, DIO LMS & Safeguarding, and the CAA Safety and Airspace Regulation Group. These consultees responded with no objection, subject to conditions where required, confirming that there is no in-principle aviation, radar or safeguarding objection to the proposal.
- 7.106 The amended layout reduces the number of turbines from fourteen to nine and reduces the overall spread of the turbine group. The reduction in turbine numbers and the more compact layout reduce the potential for interference with telecommunications, radar and other safeguarded infrastructure when compared with the original proposal.
- 7.107 No unacceptable effects have been identified in relation to aviation safety, radar, telecommunications or safeguarded infrastructure. Any technical matters that require ongoing control can be addressed through appropriate mitigation and/or conditions.
- 7.108 Taking these matters together, the proposal would not cause significant harm to the operational effectiveness of telecommunications or radar installations and would not compromise safety or cause demonstrable harm to human health or wellbeing. The proposal therefore satisfies Policy RE1 criteria (k) and the relevant safety requirements of Policy GP1 criteria (d).

- 7.109 Policy RE1 concludes that for wind farm development, a minimum separation distance equivalent to 10 times the turbine rotor diameter to residential properties will generally be sought, subject to an absolute minimum distance of 500 metres. The SPPS Edition 2 identifies that the assessment must be carried out on a case-by-case basis, with a minimum 500m separation distance to occupied property, generally applying.
- 7.110 Residential separation has been a key design consideration from the outset. The ES confirms that the layout was informed by a 1,000m separation from housing, described as double the minimum 500m separation distance. The turbines were also sited to ensure compliance with relevant noise criteria and to minimise shadow flicker effects.
- 7.111 For a 136m rotor diameter turbine, the 10-times rotor diameter guideline equates to 1,360m. With the 50m micro-siting allowance, this gives a reference distance of 1,410m. No residential property is located within the minimum 500m separation distance.
- 7.112 The ES concludes that operational noise levels would be acceptable under ETSU-R-97 derived limits, and that shadow flicker and reflected light would not cause a material reduction in residential amenity. The amended layout further reduces the number of turbine sources with potential to affect residential receptors.
- 7.113 Having regard to the separation distances, the ES amenity conclusions and the reduced turbine layout, the proposal satisfies the residential separation requirements of Policy RE1.
- 7.114 As detailed above, the proposal satisfies and complies with the requirements of Policy RE1 of the PS, demonstrating that the scheme aligns with the relevant policy tests for renewable energy development.

Policy CS3 – Areas of Constraint on High Structures

- 7.115 The site is located within a designated Area of Constraint on High Structures (ACHS) and Policy CS3 applies. This seeks to safeguard landscapes with heightened sensitivity and vulnerability to tall or prominent structures.
- 7.116 Policy CS3 permit development for high structures 25m in height or above where the proposed development complies with the following criteria and it can be demonstrated that the proposal is of such regional importance to outweigh any detrimental impact on landscape character any distinctive landscape feature and/or heritage interest in the designated area. The following paragraphs address each criterion. The consideration of regional importance is included in the conclusion at paragraphs 7.137-7.153.
- a) the structure does not interrupt key views from public vantage points;*
- 7.117 Four of the turbines within the amended proposal are located within the ACHS and the amended layout creates a more compact arrangement.

- 7.118 The ES LVIA assessed effects on public viewpoints, including closer-range views, scenic routes and locations within the wider AONB. Chapter 4 identified significant visual effects at six representative viewpoints: VP1, VP2, VP5, VP6, VP9 and VP12.
- 7.119 The FEI LVIA Addendum provides updated ZTV mapping, comparative ZTV material, wirelines and photomontages for viewpoints 1–20. It confirms that the reduced layout has been assessed against the original LVIA methodology, which remains materially unchanged.
- 7.120 The Plan Strategy does not identify specific locations of key views from public vantage points. The ES LVIA assessed representative viewpoints which responded to key characteristics identified in the landscape character assessment (Technical Supplement for the draft Plan Strategy). These characteristics include the slopes and headlands which provide the backdrop to the A2 Coast Road and Carnlough village, Carnlough Harbour, and the A42 and A43 as main tourist routes. This formed part of the LVIA selection process for the ES and has been updated in the FEI LVIA.
- 7.121 The updated LVIA map also shows the amended turbines in the context of the AONB, ACHS, scenic drives, footpaths, National Cycle Network routes and visitor destinations.
- 7.122 The degree of interruption to key views is therefore reduced. Criteria a) is met.

b) there is a need for a structure of this height;

- 7.123 The turbine tip height of up to 180m is required to access stronger and more stable upland wind resource and to secure a viable energy yield. Modern high-hub turbines maximise generation through fewer units, avoiding the increased land-take, greater infrastructure requirements and potentially greater cumulative effects that could result from deploying a larger number of smaller, less efficient turbines over a greater area.
- 7.124 The updated socioeconomic assessment confirms that the amended proposal will deliver approximately 37.8MW of renewable generating capacity. The height of the turbines is therefore integral to delivering this significant contribution of renewable energy output. Criteria b) is met.

c) there are no suitable alternative sites located outside of the designated area; and

- 7.125 This policy was introduced after the planning application was originally submitted. The preparation of the planning application followed a process of site assessment informed by achieving a suitable, viable development. That would then have been followed by a process of site acquisition and discussions with relevant landowners before bringing forward the planning application.
- 7.126 The ES explains that the layout was the product of an iterative design process informed by environmental, technical, engineering and landscape considerations. The FEI demonstrates that this iterative process has continued, with further amendments made in response to environmental, landscape, heritage and ecological considerations.

- 7.127 The site retains a viable wind resource, the land remains available, there is a feasible access from the A42 and it has grid connection potential, while the amended layout reduces environmental and landscape impact.
- 7.128 As set out above, not all of the turbines are located within the ACHS. The development cannot be reduced further to avoid the ACHS entirely as this would reduce the renewable generating capacity and make the development unviable. Criteria c) is met.

d) appropriate mitigation measures are in place to minimise the impact of the proposed structure on the designated area.

- 7.129 The amended layout is itself a principal form of mitigation. It reduces the spread of development, increases separation between remaining turbines, reduces the number of turbines within the ACHS, reduces internal access tracks, crane hardstanding areas and forestry removal. This creates a more compact arrangement of construction and operational infrastructure.
- 7.130 The FEI LVIA Addendum confirms that the amended layout has been assessed through updated ZTVs, viewpoint material, cumulative baseline information and photomontages. The reduced layout is therefore a principal form of mitigation. Further mitigation includes use of existing tracks where feasible, minimising watercourse crossings, avoiding areas of deep peat and sensitive habitats, underground cabling, micro-siting controls, CEMP measures, SuDS, habitat management and reinstatement of temporary construction areas.
- 7.131 Mitigation measures are therefore in place to minimise the impact on the designated area. Criteria d) is met.

Conclusion

- 7.132 The aim of the 2nd Edition of the SPPS is to maximise sustainable renewable and low carbon energy development. This supports and reinforces the requirements of the Climate Change Act and the policy support from wider Government policy and Strategy, which is set out in Section 3 of this statement.
- 7.133 The SPPS requires planning authorities to give appropriate weight to climate considerations, including the target to generate 80% of electricity consumption from renewable sources by 2030. Planning authorities must also help facilitate delivery of the necessary increase in appropriate renewable and low carbon energy development so that the contribution of this sector is optimised. This requires careful balancing of the local impacts with the wider environmental, economic and social benefits.
- 7.134 This identifies that there needs to be an increase in electricity consumption from renewable sources and that planning authorities have a role to play in achieving that increase. In doing so, they must optimise the contribution from the renewable sector.
- 7.135 The benefits of the development are set out at paragraphs 4.22 – 4.24 of this statement.

- 7.136 The proposed development will deliver essential renewable electricity generation, directly supporting Northern Ireland's low-carbon transition, carbon-reduction targets and security in the electricity supply. The updated Socioeconomic Assessment confirms that the amended proposal would have an installed capacity of 37.8MW and is expected to generate approximately 71GWh of renewable electricity per annum, equivalent to the needs of over 21,000 homes.
- 7.137 The proposal will also deliver significant economic benefits. It is estimated to involve a capital spend of approximately £77 million, of which approximately £29 million would be realised within the Northern Ireland economy. During construction, the proposal is estimated to create or sustain approximately 200 job years, £5.9 million in wages and £14.0 million in GVA to the Northern Ireland economy. During operation, annual benefits are estimated at 4 jobs, £110,000 in wages and £620,000 in GVA. The proposal is also expected to generate approximately £2.5 million in tax revenues during construction, with a further £180,000 in annual operational tax revenues and over £375,000 in annual business rates.
- 7.138 The economic benefits of the development are therefore significant. The proposal will also make a significant contribution to renewable energy generation capacity, energy security and the delivery of statutory climate objectives.
- 7.139 The Climate Change Act requires 80% electricity consumption from renewable sources by 2030. That is just under three years from now. The current generation level from renewable sources in Northern Ireland is 47% according to NISRA. In this context, there is a clear and pressing need to deliver more renewable energy generation and the SPPS has confirmed that an increase is necessary. Therefore, the generating contribution of this development is significant.
- 7.140 These environmental, economic and social benefits must be carefully balanced with potential local impacts.
- 7.141 The assessment above and additional information provided through the FEI demonstrates that the proposal will not give rise to unacceptable impacts on heritage, residential amenity, tourism, ecological interests or the local road network.
- 7.142 The visual impact of the proposal is considered through Policies RE1, CS3 and CS5 and the assessment against these policies is at Paragraphs 7.12 – 7.28 of this statement.
- 7.143 There were significant effects identified at less than one third of the viewpoints assessed in the ES. The FEI LVIA has identified that there are no greater visual effects from the identified viewpoints within the landscape assessment.
- 7.144 The amended layout reduces the spread of turbine development and associated infrastructure, including access tracks, crane hardstanding and forestry removal. It also reduces the number of turbines visible in a number of views and reduces the visual density of the development. The proposal would therefore give rise to no greater landscape and visual effects than those assessed in the ES and, in several respects, materially reduced effects.

- 7.145 There has been a reduction in visual impact through the amended layout, demonstrating a willingness to lessen the potential impacts whilst still maintaining a viable development.
- 7.146 The benefits of the proposed development are significant. There is clear planning policy and wider Government policy direction supporting the need to increase renewable electricity generation and deliver on the statutory target within the Climate Change Act for Northern Ireland.
- 7.147 There is a narrowing window for viable developments that will contribute to the statutory target within the Climate Change Act. The need to generate energy from renewable sources will also not stop in 2030. There remains an ongoing important need to continue to deliver electricity generation from renewable sources in NI.
- 7.148 Taking these factors into account, the environmental, economic and social benefits of the development outweigh the potential visual impact of the development including impacts on the AONB and the location of part of the development within an Area of Constraint on High Structures. The proposal therefore satisfies Policy RE1 criteria (a), Policy GP1 criteria (a) and (f), Policy CS3 and Policy CS5.

8. Conclusion

- 8.1 RES Ltd is seeking full planning permission for 9 no. three-bladed horizontal-axis wind turbines, each with a maximum blade tip height of 180 metres, together with all enabling and permanent infrastructure required for the construction, operation, maintenance and decommissioning of the development. The proposal represents renewable energy infrastructure of strategic scale and has been materially amended to reduce its environmental and landscape effects while retaining a meaningful renewable energy output.
- 8.2 The amended scheme will deliver approximately 37.8MW of installed renewable electricity capacity and generate approximately 71GWh of renewable electricity per annum, equivalent to the needs of over 21,000 homes. It will make a direct contribution to regional decarbonisation, renewable electricity generation, energy security and grid resilience. In the context of the statutory target for at least 80% of electricity consumption from renewable sources by 2030, and with that target date approaching, the benefits of the development and its contribution to regional energy objectives should be afforded significant positive weight.
- 8.3 The 2nd Edition of the SPSS places a clear emphasis on the need to maximise sustainable renewable and low carbon energy development and to give appropriate weight to climate considerations. The proposal is therefore strongly supported in principle by the updated regional policy context, subject to the proper assessment and management of local environmental effects.
- 8.4 The amended layout represents mitigation by design, reducing turbine numbers, the spread of development, the infrastructure footprint, interaction with sensitive environmental receptors and construction-related effects.
- 8.5 The matters previously raised in respect of landscape and visual impact, tourism, natural heritage, archaeology, noise, shadow flicker, hydrology, peatland, rural character and traffic have been addressed through the amended layout and updated technical information. The amended layout directly responds to the concerns associated with the original proposal by reducing turbine numbers, visual spread, infrastructure footprint, interaction with sensitive locations, construction traffic and potential amenity effects. The ES and FEI demonstrate that any remaining effects are localised, limited and capable of being appropriately mitigated, including through planning conditions where necessary, and are not of a scale that would outweigh the substantial renewable energy, climate, economic and social benefits of the scheme.
- 8.6 Therefore, taking these factors into account, the benefits of the development from an environmental, economic and social benefits outweigh the potential local impacts of the development.

**Appendix 1: LA02/2021/1205/F Section 26
Planning Application Development
Management Report**

Section 26 Planning Application Development Management Report

Ref Number: LA02/2021/1205/F

Proposal: Proposed wind farm comprising 14 three-bladed, horizontal axis wind turbines, each up to a maximum of 180m to tip height, associated external electricity transformers; underground cabling; a newly created site entrance; access tracks; turning heads; crane hardstandings; control building and substation compound, 4 battery energy storage containers, tree felling, off-site areas of widening to the public road and all ancillary works. During construction and commissioning there would be a number of temporary works including a construction compound with car parking; temporary parts of crane hardstanding's and welfare facilities.

Location: The application site is located approximately 5km to the South West of the village of Carnlough Village and 5km west of Glenarm, Co. Antrim in the townlands of Drumourne Unshinagh Mountain, Unshinagh South, Ticloy, Slane, Cregcattan (part of Galdnagh) and Aughareamlag. The proposed site entrance is located to the eastern boundary of the site and is approximately 150m north of Doonan Leap Car park. The southern boundary of the site is approximately 380m from the Slane Road with the northern site boundary approximately 2.4 km from the village of Carnlough.

Applicant: Renewable Energy Systems (RES)

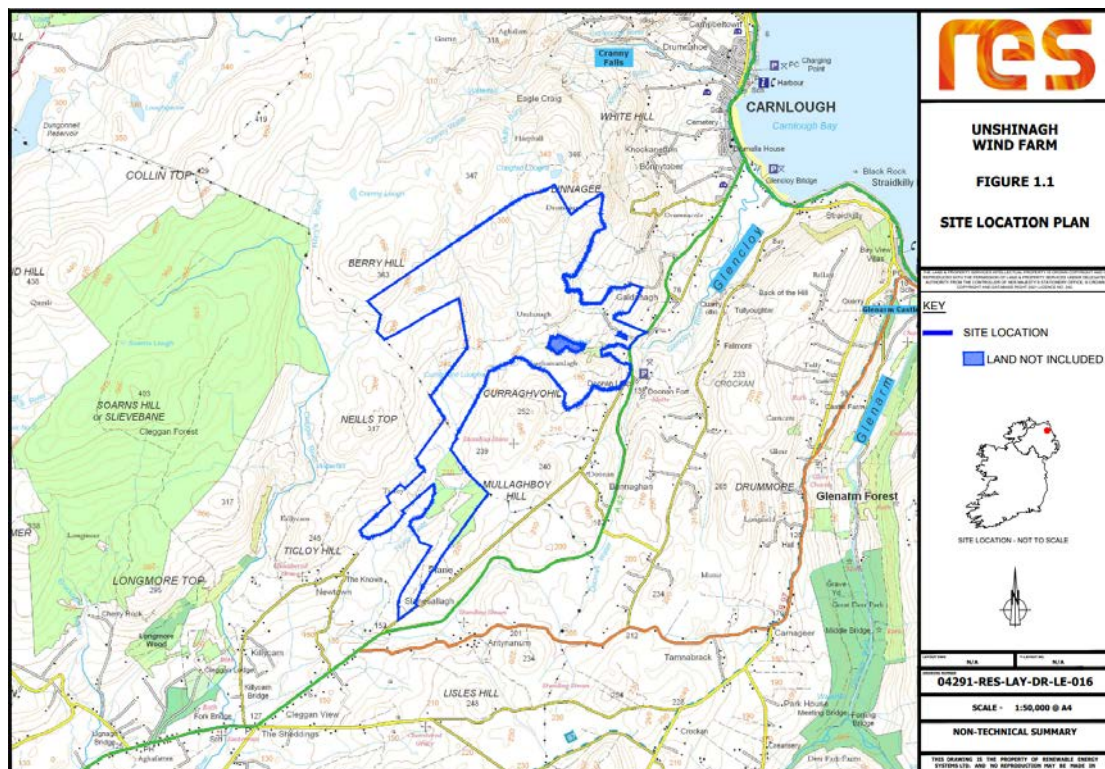
1.0 THE PROPOSAL

- 1.1 The application is for full planning permission for a wind farm comprising 14 turbines – with an overall maximum height of 180 metres. A micro-siting area of 50 metres for turbines and tracks is proposed to accommodate variations encountered on site and to allow flexibility to help mitigate any potential environmental effects uncovered at construction stage. The development will also comprise ancillary development including an upgraded site entrance, access tracks, crane hardstandings, control building and substation compound, electricity transformers, underground cabling, battery energy storage containers (four permanent containers housing battery energy storage device, inverters and other ancillary equipment will be positioned adjacent to the control building and substation compound on hardstanding used originally for the temporary construction compound) and drainage works.
- 1.2 The application was submitted on 22 December 2021 but was not valid until 22 February 2022. The Environmental Statement (ES) was initially submitted on 10 February 2022 but was deemed to be incomplete. Further Environmental Information was requested on 22 March 2022 and received on 1 June 2022. This made the incomplete ES complete and allowed the statutory process to commence in terms of consultations and advertisement.
- 1.3 The applicant is Renewable Energy Systems Ltd. (RES).
- 1.4 The site will be accessed from the A42 Carnlough-Ballymena Road.
- 1.5 Connection to the grid system via a combination of overhead line and underground cables following the public road. The two most likely options available stated in the ES are to either the existing Kells or Ballymena Substations. Although not a part of the planning application for the development, proposed grid connection route is illustrated and

the environmental effects have been assessed and these are presented in Appendix 2.1.

2.0 SITE AND SURROUNDING AREA

2.1 The site is within Mid and East Antrim Borough Council area (MEABC) within the Antrim Coast and Glens Area of Outstanding Natural Beauty (AONB) approximately 2.8 km to the South- West of the coastal village of Carnlough and approximately 17 km to the North- East of Ballymena town centre. The turbines would be located on upland grazing land between the townlands of Unshinagh and Ticloy on the Garron Plateau uplands to the south east of Cleggan Forest and below the summits of Berry Hill, Binnagee and Neill's Top. The land is currently used for sheep and cattle grazing and the ES advises it predominantly comprises semi-improved agricultural land that is well managed with extensive stoned farm tracks providing access to agricultural fields which are bounded by mature hedgerows and stone walls.



- 2.2 The wider area is designated as a Special Area of Conservation (SAC) and Area of Specific Scientific Interest (ASSI). The ES advises that 4 of the proposed turbines are within the Antrim Hills Special Protection Area (SPA) which has been designated for hen harrier and merlin. The proposed site is downslope from the Garron Plateau SAC/ASSI.

3.0 PLANNING ASSESSMENT

- 3.1 A summary of consultee comments, representations and information on the process history of the application and planning history of the site can be found in the appendices.

Alternatives

- 3.2 The EIA Regulations (Schedule 4) deals with 'Matters for inclusion in Environmental Statement'. Schedule 4(2) requires a description of the reasonable alternatives (e.g. design technology, location, size and scale) studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.
- 3.3 Chapter 3 of the ES deals with the design evolution and alternatives. Para 3.21 advises that RES has a robust site selection methodology, using GIS to aid identification of potential wind farm sites. Para 3.22 says the development site meets their criteria (listed at para 3.28). The ES does not advise of any other sites that the applicant had considered other than this site.
- 3.4 The applicant, RES, has provided information on the alternative layout designs for this particular site. (para 3.23 onwards). A number of layouts are discussed in Chapter 3 with RES advising the proposed layout has evolved in response to policy considerations, environmental, technical,

engineering, landscape and visual considerations and consultee feedback.

Policies and Plans

3.5 The application falls to be assessed under the relevant policy criteria and all relevant material considerations are considered below. A full list of policy documents considered is provided at Appendix 4.

3.6 The key issues are:

- Government commitments and strategies – renewable energy;
- Planning policy context and impact on the environment and amenity;
- Any other material planning considerations

Government commitments and strategies – renewable energy

3.7 This wind farm has the potential to produce 58.8MW of renewable electricity which would contribute to the Northern Ireland target to achieve 70% of its electricity consumption from a diverse mix of renewable resources by 2030 as set by DfE in the Energy Strategy – The Path to Net Zero Energy and the more ambitious target of 80% renewable energy by 2030 towards achieving carbon net zero by 2050 set by the Climate Change Act (Northern Ireland) 2022 which received Royal Assent in June 2022. Renewable energy technologies support the wider Northern Ireland economy and offer new opportunities for additional investment and employment, as well as benefitting our health and well-being, and our quality of life. The latest official NISRA statistics on electricity consumption from renewable sources in Northern Ireland were published on the DfE website on 7th December 2023 and advise that for the 12-month period October 2022 to September 2023, 47.4% of total electricity consumption in Northern Ireland was generated from renewable sources.

Regional Development Strategy (RDS)

3.8 The RDS sets out the guidelines for the development of Northern Ireland until 2035. Strategic policy guidance is provided through Regional Guidance (RG) which applies to the region as a whole and Spatial Framework Guidance (SFG) which is tailored to specific areas that make up the spatial framework of Northern Ireland. Regional Guidance (RG) material to the consideration of this application includes REG3, RG4, RG5, RG9 and RG11. Spatial Framework Guidance (SFG) particular to this application includes SFG13. Making appropriate use of renewable energy sources is supported by the RDS in terms of its contribution to the achievement of renewable energy targets and the need to increase the contribution that renewable energy can make to the overall energy mix.

Development Plan Context

3.9 Section 45(1) of the Planning Act (NI) 2011 (the Act) requires regard must be had to the Local Development Plan (LDP), so far as material to the application, and to any other material considerations. Section 6(4) of the Act states that where regard is to be had to the LDP, the determination must be made in accordance with the LDP unless material considerations indicate otherwise.

3.10 The Planning Act (NI) 2011 establishes a plan-led planning system which gives primacy to the LDP in the determination of planning applications unless other material considerations indicate otherwise. The Plan Strategy became effective from the date of adoption (16 October 2023) and is now relevant to the consideration of this planning application. As the Council has yet to adopt its Local Policies Plan, in the interim, and in line with the transitional arrangements set out in the Schedule to the Regulations, the LDP is currently a combination of the departmental development plan (DDP) and the Plan Strategy read

together. Any conflict between a policy contained in the DDP and those of the Plan Strategy must be resolved in favour of the Plan Strategy.

3.11 The following policies in the MEABC Plan Strategy are considered most relevant and against which the application will be assessed:

- Under Part 1 of the Plan Strategy which sets out strategic spatial proposals are associated policies linked to the LDP Spatial Growth Strategy and Countryside Strategy:
 - CS1 Sustainable Development in the Countryside
 - CS3 Areas of constraint on High Structures
 - CS5 Antrim Coast and Glens Area of Outstanding Natural Beauty
- Reference should then be made to Part 2 of the Plan Strategy and should consider firstly:
- GP1 'The General Policy for all Development Plan Strategy' which sets out general policy criteria for all development. These policy criteria apply to all development proposals and the planning authority must firstly consider them when taking decisions on planning applications for which it is responsible.
- Having considered the proposal under the general policy criteria, reference should then be made to the relevant Strategic Subject Policies set out in the remainder of Part 2:
 - RE1 'Renewable Energy Development'
 - CS1 Sustainable Development in the Countryside
 - CS3 Areas of Constraint on High Structures (ACHS)
 - CS5 Antrim Coast and Glens Area of Outstanding Natural Beauty
 - Policy TOU1 Safeguarding of Tourism Assets

- Policy TR1 Access to Public Roads
- Policy TR6 Parking and Servicing
- Policy FRD1 Development within Floodplains
- Policy FRD2 Protection of Flood Defence and Drainage Infrastructure
- Policy FRD3 Management of Development in regard to Surface Water Flood Risk
- Policy FRD4 Sustainable Drainage (SuDS)
- Policy FRD5 Artificial Modification of Watercourses
- Policy HE1 Archaeological Remains and their Settings
- Policy NAT1 European and Ramsar Sites – International
- Policy NAT2 Species Protected by Law
- Policy NAT5 Habitats, Species or Features of Natural Heritage Importance

3.12 The proposed site falls within areas covered by both the Ballymena Area Plan 1986-2001 and the Larne Area Plan 2010. Whilst the Ballymena Area Plan is silent on renewable energy development, the Larne Area Plan does have a short section on energy, including mention of being supportive of initiatives aimed at reducing the demand for energy from fossil fuels. It also refers to the large areas of exposed upland and states the Antrim Coast and Glens Area of Outstanding Natural Beauty would not be considered suitable for the location of wind turbines.

3.13 However, there is considered to be no conflict between the DDPs and the Council's adopted Plan Strategy and therefore the provisions of Policy RE1 – Renewable Energy within the Plan Strategy and the regional policy for renewable energy within the SPPS will primarily apply to this proposal for renewable energy development.

Planning policy context and impact on the environment and amenity

Planning Policy Context

3.14 This application is for a renewable energy project and is assessed against the Strategic Planning Policy Statement (SPPS), Policies GP 1 'The General Policy for all Development' and RE1 'Renewable Energy Development' of MEABC Plan Strategy (PS). In the context of the SPPS, the wider environmental, economic and social benefits of all proposals for renewable energy projects are material considerations that will be given appropriate weight in determining whether planning permission should be granted. This is also reiterated in Policy RE1 of the PS.

The wider environmental, economic and social benefits of all proposals for renewable energy projects are material considerations that will be given appropriate weight in determining whether planning permission should be granted.

Environmental Economic and Social Benefits and the Planning Balance

3.15 It is noted in the SPPS that consideration of all renewable energy proposals will take account of their contribution to the wider environmental benefits.

3.16 The environmental, economic and social benefits of the proposal are set out in Chapter 13 of the Environmental Statement (received February 2022).

3.17 Chapter 13 concludes that this wind farm project will offer a much needed boost of activity to the local and regional economy. In summary it is estimated to involve a capital spend of nearly £62 million of which £24.70 million will be realised within the Northern Ireland economy (i.e. c40%).

The construction phase is projected to last for 12 months and create or sustain 139 - 243 total (direct, indirect and induced) job years of employment, £3.37 - £5.96 million (2018 prices) of wages and £7.56 - £13.04 million of GVA to the Northern Ireland economy. In terms of the

operational phase the benefits including wages (direct, indirect, induced) from the development are estimated at £3.2 million and £12.3 million in GVA (2018 prices) over a 35 year operating period (although para 3.64 of the NTS refers to a 30 year lifespan). During the construction period the UK Exchequer is estimated to benefit from increased tax revenue of £1.24-£2.18 million. Over the proposed 35 year lifetime of the wind farm an estimated £1.08 million revenue will be generated (and a further £0.43 - £0.94 million in benefit savings during the construction phase). Over the lifetime of the project, business rates will collectively amount to approximately £19.30 million. Land rent contributions have not been specified and are therefore given no weight in this consideration.

3.18 In environmental terms the electricity produced by the development is estimated at 236.9gWh per year - enough to meet the needs of 62 800 homes per year. The development is also estimated to reduce CO2 emissions by 104 700 tonnes each year.

3.19 DfI Economics Branch (EB) has been consulted, with their role to assess if the economic benefits claimed are reasonable or excessive. In their response of August 2022 EB is content with the overall approach and consider many of the socioeconomic benefits to be reasonable. However, they question a number of areas and believe greater clarity is particularly required regarding the energy capacity of the development and all the benefits that are related to these estimates. EB also raise issues of how long it takes for the development to become carbon neutral, negative impacts – e.g. on tourism revenues and the difficulty in quantifying this, and details on actual job numbers and benefits to the local area. Accordingly, it is considered that it is not possible based on the information provided to afford appropriate weight to the wider economic and environmental benefits in the absence of a realistic forecast of the benefits of this project.

Public Safety/Human Health/Residential Amenity

Noise

3.20 The noise associated with wind farm developments has the potential to impact on residential amenity. MEABC Environmental Public Protection, Health and Well-Being (PPHWB) advise in their consultation response of July 2022 they have considered the application. They raise a number of issues including:

- the robustness of the Met Office Radar data relied upon in para 10.62 of the ES.
- queries regarding a number of the residential properties listed in Table 10.8 and also that a residential dwelling was not considered (currently under construction) and which may be the nearest dwelling to cumulative turbine C1 (G/2013/0377/F) and hence the controlling property.
- Absence of the manufacturers data in relation to the candidate wind turbine, (a Vestas V136 4.2MW with a hub height of 112m) upon which the predicted noise impacts have been based.
- In terms of construction noise, predicted levels temporarily exceed 65 dB(A) at H19 and H25. Paragraph 10.1019 notes, “the temporary exceedance of the 65 dB(A) daytime target level ... can be mitigated by the use of acoustic barriers if necessary.” MEABC PPHWB request that the applicant provide a construction noise monitoring protocol which will regularly monitor noise levels at H19 and H25 during periods when construction noise is likely to be highest. If construction noise levels exceed 65 dB(A), mitigation measures should be put in place to reduce the noise impact to below 65 dB(A).
- Cumulative Noise Impacts – the applicant has presented information regarding single turbines but has not included a correction for uncertainty. However, MEABC PPHWB point out that planning permissions from cumulative wind turbines A1, B1 and C1 are now

over 5 years old and hence unless a material start has been made, such permissions may have 'timed out'.

3.21 As such based on the information available the applicant has failed to demonstrate that the proposed wind farm will not have impacts on sensitive receptors as there is uncertainty over some of the figures and data used in the ES. Therefore, based on the information presented in the ES it is my opinion that in terms of potential noise impacts that the application is not compliant with the SPPS or Policies GP1 (b) and RE1 criteria (b) of MEABC Plan Strategy.

Shadow Flicker

3.22 Policy RE1 criteria (b) of MEABC Plan Strategy advises the following criteria must be met:

'will not cause significant harm to the safety or amenity of any sensitive receptors (.....) arising from noise; shadow flicker, ice throw and reflected light'

3.23 Additionally for wind farm development a 'separation distance of 10 x rotor diameter to residential properties (including extant permissions), with a minimum distance not less than 500m, will generally apply'. In this case 1360 metres would be the '10 x rotor diameter' distance and the applicant has added a further 50m for micro-siting (1410 metres). Twenty four properties have been assessed with thirteen dwellings potentially affected in a worst case scenario. The Best Practice Guide (BPG) that accompanies PPS 18 – Renewable Energy is cited at para 9.3.20 of MEABC Plan Strategy and continues to be taken into account in assessing proposals. Para 1.3.77 of the BPG advises that careful site selection, design and planning, and good use of relevant software, can help avoid the possibility of shadow flicker. It is recommended that shadow flicker at neighbouring properties within 500m should not exceed 30 hours per year. No properties fall within 500m and additionally the

table at Para 12.14 of the ES indicates that while 13 properties may experience some shadow flicker, 5 may exceed 30 hours per annum (ranging from 34.8 hours to 57 hours). The above impacts represent a worst-case scenario in that the analysis assumes:

- a. there is always sufficient lack of cloud cover, for there to be sufficient sunlight for shadows to be cast by the turbine.
- b. there is always enough wind for the turbine blades to be turning.
- c. the wind is always coming from the right direction for the turbine rotor to be facing towards the house, to thus cast a shadow.
- d. the property has windows and/or glazed doors facing towards the turbine.
- e. there is no shielding, e.g. in the form of trees, between the turbine and the property.

3.24 In all instances these 5 properties are 1000 metres or more from the nearest turbine. (1000m -1345m). The ES states that 'Mitigation will be assessed for the affected houses as necessary.' Given the distances involved between the turbines and the 5 potentially worst affected properties, I am in agreement with Para 12.16 of the ES that concludes that 'Unshinagh Wind Farm will not cause a significant reduction to residential amenity owing to shadow flicker.' A standard shadow flicker mitigation condition can be attached should planning permission be granted.

Human Health and Public Safety

3.25 The application also includes a battery energy storage system (BESS) – a low-key containerised scheme involving lithium-ion battery technology consisting 4 battery containers (up to 16 MWh provided) with ancillary heating, ventilation and air-con units and transformers. The ES states at para 1.29 of the May 2022 Addendum that 'the type and quantities of chemicals used for the batteries do not fall within the Schedule listed in the Planning (Hazardous Substances) Regulations (NI) 2015 and therefore do not require Hazardous Substance Consent'.

3.26 MEABC Plan Strategy - Policy RE1 - Para 9.3.15 in the J&A states that 'applicants should also ensure that any associated buildings or infrastructure such asenergy storage facilities are all appropriately located.' Additionally, para 9.3.19 states that 'Other forms of energy generation and energy storage are now being considered on or adjacent to wind farms. The impacts of this additional infrastructure should be assessed, and considered in the design process, as should the benefits of co-locating these with the wind farm. In most cases, the impacts of co-located energy generation and storage systems are likely to be limited compared to the overall landscape and visual impacts caused by the wind farm. However, in all cases additional infrastructure should be designed and located to minimise impacts especially if they include significant structures or are likely to add to the 'clutter' of the landscape.'

3.27 Battery Storage helps to match generation produced from intermittent renewable generation with the peaks and troughs in electricity demand thereby contributing towards renewable energy targets and helping to ensure a secure electricity supply. The applicant has indicated that the need for battery storage has been identified by SONI under the DS3 programme which is required to allow Northern Ireland to meet its renewable energy targets (recently set at 80% by 2030 under the Climate Bill.) The energy storage element of the application would also provide distribution, reinforcement and deferral services. These enable existing electrical network assets such as substations and overhead lines to have their capacity increased without the need for building new infrastructure. These uses involve charging the battery system with electricity, storing electricity for a period, or discharging electricity. The proposed BESS element of the proposal could make a valuable contribution to Northern Ireland's secure, low carbon and affordable electricity system if the overall wind farm development is granted planning permission. In this instance I therefore consider the BESS element to be appropriately located within the footprint of the wind farm and that the impacts are limited in comparison to the overall landscape

and visual impacts discussed below. Should Unshinagh wind farm receive planning permission I consider the BESS element to be an important element as it can enhance the grid's ability to accommodate renewable energy technologies.

3.28 A characteristic of a lithium-ion battery is that it has the potential to fail with such failures known as 'thermal runaway' - where a battery cell experiences uncontrollable overheating, often accompanied by the release of large quantities of flammable off-gases. Thermal propagation from the failing cell may lead to incipient thermal runaway of adjacent cells, thus creating a cascading failure across the system, resulting in large amounts of heat and gas. When these gases are allowed to accumulate in an enclosed space (such as a BESS container), an explosive atmosphere may develop, which, given an ignition source, may lead to an explosion event. Such a blast wave can cause damage to nearby buildings and structures.

3.29 Contaminated runoff water may also affect the surrounding area through fire suppressant water systems or firefighting procedures in the event of a failure/incident. NIEA has referred to this matter and whilst they have no objections overall have suggested conditions and/or informatives including an Emergency Response Plan to cover environmental mitigation in the event of a BESS fire or explosion.

3.30 NI Fire and Rescue Service has no objection to the proposal subject to Fire Safety Regulations. The application has not assessed potential impact on firefighters attending a fire at the facility. HSENI has no comment to make on the application.

3.31 In this application, the ES states that the nearest dwelling is 1295 metres from the proposed BESS development. Accordingly, given the separation distance between the BESS compound and the nearest dwelling I do not consider the proposed BESS infrastructure comprising

4 energy storage containers will result in an unacceptable adverse impact on public safety and human health and is therefore complaint with Policy RE1 (b) of the Plan Strategy.

Landscape Character and Visual Impacts

3.32 The proposal is located within the Antrim Coast and Glens AONB. It falls within Landscape Character Area (LCA) 122: Garron Plateau as identified in supplementary planning guidance (SPG) NIEA's publication 'Wind Energy Development in Northern Ireland'. This LCA is identified as having high sensitivity to medium sensitivity to wind energy development. The SPG advises that areas of lesser sensitivity to wind energy development occur in the south-west, closer to Cleggan Forest. However, the area's scenic quality and intact peatland habitats results in high sensitivity over most of the LCA. The proposed turbines are located in the south east of LCA 122, east of Cleggan Forest and to the west of Glencloy Glen. The SPG advises that the stepped landforms and rounded knolls around the plateau edges form prominent open skylines that are highly visually sensitive and are the setting for the coastal glens of Glenarriff and Glencloy. In terms of location, siting, layout and design considerations, the SPG advises that care needs to be taken to avoid adverse impacts on key views, particularly views from the coastal glens and the sea to the east, and on the wild character of the area. Care also needs to be taken to avoid adverse visual effects on areas of complex terrain and areas of upland loughs and rocky outcrops. The landscape interests of natural and cultural features and recreational resources should be respected.

3.33 In cumulative terms the closest existing windfarms are Rathsherry and Elginny Hill (8-10 km to the south west) and the consented wind farm at Ballykeel also within the AONB and LCA 124, approximately 13km to the south east of the development, with single turbines also in the wider landscape. The proposed Ballygilbert Wind Farm (LA02/2020/0458/F) is located within the Antrim Coast and Glens AONB approximately 8km to

the south east (east of Glenarm Glen). That application is currently with the Planning Appeal Commission to schedule a Public Inquiry.

3.34 Para 4.13 of the ES states 'The Development is located in conformance with the SPG's guidance for LCA 122 Garron Plateau which is noted as being suitable for wind energy development in theory. The proposed site location is noted as being of medium and lesser sensitivity than other parts of LCA 122.' I would not agree with this assertion as the SPG does not state this. While the site may be located approximately 2km east of Cleggan Forest, it is also notable in that it sprawls over an area sandwiched between the forest and Glencloy Glen. Indeed the SPG refers to the importance of clustering and wind energy development in this LCA when in fact this layout could be considered as two clusters (8,9,10 & 11 to the south). (N.B Para 9.3.13 of the MEABC Plan Strategy refers to the SPG Document as well as their own Landscape Character Assessment – Technical Supplement 10 Countryside Assessment).

3.35 At a strategic level, the site is contained within RLCA 18 (Antrim Plateau and Glens) within the NI Regional Landscape Character Assessment. This publication (NIEA) describes the upland plateau and hills, dissected by glens that run down to the sea. The combination of upland edges and river mouths creates a distinct and remarkably scenic coastline of cliffs and bays. The coastal settlements retain a strong local character, closely culturally associated with the west coast of Scotland. The A2 coast road is a popular tourist drive, while the plateau provides accessible but remote landscapes of moorland and bog. Settlement is concentrated on the coast, in the bays between headlands, and corresponding with river crossings at the foot of each valley. As well as the A2, other major roads cross the plateau where the glens cut through, such as the A43 through Glenariff, and the A42 through Glencloy. In terms of landscape character assessment, The Antrim Plateau and Glens RLCA incorporates several types of landscape, from dramatic coastal cliffs and tranquil bays, to scenic, intimate glens carved into remote, exposed and generally

undeveloped uplands of the Antrim Plateau, with dramatic landscapes of windswept upland, intimate and remote glens or wild and rugged coast. The area is a very popular location for visitors seeking outdoor recreational opportunities. There is access in the form of long-distance routes such as the Ulster Way and the Antrim Hills Way and other circular walks. In terms of 'Past, present and future forces for change' and renewable energy – RLCA 18 has operational wind farms on the western edge of the Antrim Plateau, overlooking the lowlands to the west.

3.36 The landscape and visual photomontages submitted with this application are a useful starting point in assessing the potential impacts of this proposal. Twenty viewpoints have been selected within a 25km radius of the site. Of the viewpoints selected, while the detail and clarity of some can be criticised (e.g. VPs 1, 6, 9, 10, 16 & 18) they nonetheless are sufficient to assess the overall impacts of this development. Table 4.2 of the ES provides the applicant's summary of the visual effects on the selected viewpoints concluding that 6 of 20 viewpoints identify significant visual effects (VP 1, 2, 5, 6, 9 & 12). I consider the following viewpoints to demonstrate significant adverse impacts on landscape character and visual amenity:

VP 1 – at close range (<1Km) from Slane Road which runs adjacent to the A42 Glenarm Scenic Route – turbines will dominate the vista in this largely unspoilt landscape (there are sheds, overhead lines and pockets of forestry in the vicinity). The turbines are quite faint in the montage but in reality impacts will be significant in terms of scale and massing.

VP 2 – Further along Slane Road on eastern side of Mullaghboy Hill. Turbines will dominate the backdrop. An A3 photomontage flattens the landscape and the drama of the skyline is diminished.

VP 4 – Above Glenarm (Dickeystown) (approx. 6km). In isolation this viewpoint is probably acceptable. However, when you drive further

towards the village of Glenarm then cumulative impacts in association with the existing quarry and masts are adverse.

VP 5 – (2km to turbines) The turbines will dominate the skyline and will have a significant adverse impact on the scenic drive into Carnlough.

VP 6 – this location shows views west from Straidkilly Road, Carnlough. This landscape forms the backdrop to the approach to Carnlough when travelling north. The turbines, whilst quite faint in the montage, will undoubtedly dominate the skyline on this scenic location.

VP 7 – Carnlough Harbour Park (<3km). T1 and 2 will dominate the headland above the village. The village is a conservation area and important tourist location within the north coast/AONB. The Park includes a reference board to Game of Thrones – a sign of the importance of media/film tourism in the general locality. Impacts from VP 8 Cranny Falls are similar in nature to VP 7. Despite there only being two turbines visible, I consider impacts to be significant and adverse – visibility in terms of views in proximity to Carnlough is noted at para 4.16 of the ES.

VP 9 – View westwards from Ballyvaddy Road (within Glencloy Glen) (approx. 2.4km). Turbines will dominate the skyline of this attractive landscape that forms the setting for Carnlough and sea views which have been omitted from the picture (and which I consider are important to include). Impacts will be significant and adverse.

VP 10 – View westwards from the Ulster Way at Crockandoo, Feystown Road (<6km). Again, I consider that this VP underplays the impacts in a number of ways – the quality of the photograph does not show the significance of the upland landscape/skyline and it omits the impacts on the setting of Carnlough and Glenarm (out of frame) - two single turbines within view help give an impression of scale and impact that 180m turbines are likely to have on this landscape. There will be significant adverse impacts on this part of the AONB and significant views when travelling north along Feystown Road towards VP 10. Cumulatively, from Feystown Road, the proposed Ballygilbert Wind Farm is located in close proximity to the east (see BG Views 7 & 9).

VP 11 – Glenview Road, (<7km SE of site). In my opinion 180m high turbines would dominate this landscape and obscure the higher more dramatic landform behind it (and which this montage fails to convey). On site – existing smaller single turbines help to demonstrate impacts of scale and impact.

VP 12 – (<3km SE of the site) from Munie Road, Aughafatten. Again, I consider that this A3 photomontage flattens and reduces the scale of turbines and the landscape - whereas in reality the turbines will dominate the foreground and dwarf the skyline behind.

VP 15 – This view from the summit of Slemish in a NE direction is <8km from the proposed site. Given the wide-ranging panoramic views from Slemish in all directions, I consider the impact to be significant and adverse. The associated wireframe refers to other existing and proposed windfarms in the wider landscape and this cumulative effect is an important consideration in terms of views from this iconic landmark.

VP 16 – Viewpoint at Carnalbanagh (<4km) showing clear uninterrupted views of the pristine AONB landscape and dramatic skyline. Slemish is visible out of frame. 180m high turbines will dominate the skyline and interrupt the wildness and tranquillity of this location. Again – the photomontage does not do justice to the quality of the landscape here in terms of drama and clarity. (To note that the proposed Carnalbanagh Wind Farm (LA02/2017/0594/F) within the AONB is also before the Planning Appeals Commission to schedule a Public Inquiry).

VP 17 – From the Ulster Way at Scawt Hill (<10km SE of the proposed site) – Unshinagh WF is spread across the landscape for some distance. Additionally, from this location it is viewed through the proposed turbines of Ballygilbert Wind Farm thereby setting up potential cumulative impacts which this montage clearly shows.

VP 18 – From the Ulster Way at Knockdhu approximately 10km to the SE. The landscape is of good quality and is part of the tourism route to the north coast including the Game of Thrones tourism draw. Again, the montage clearly shows the potential for significant cumulative impacts should Ballygilbert Wind Farm receive planning approval following the public inquiry.

3.37 While the viewpoints themselves are useful tools, additional sequential views are an important consideration and in particular views when travelling along the Glenarm Scenic Route (A42), Dickeystown Road to the east, Munie Road and the Kilnacopagh Road both south of the site and views travelling north along Feystown Road looking north west are considered significant and adverse.

3.38 The SPPS at para 6.223 advocates a cautious approach to wind farm development in designated landscapes such as AONBs. While other wind farms may have been approved in AONBs or sites deemed for their high sensitivity to such development, direct comparison is rarely applicable as sites will have different characteristics or may have been approved under different policy or circumstances (e.g. prior to the SPPS).

3.39 I would agree with the ES that close range views and those to the south are significant and adverse but would not limit this to VPS 1,2,5,6,9 & 12 as detailed above. This location within the AONB is a highly attractive and quality landscape above Glencloy Glen. Impacts also range from Slemish in the south west, and from the east near Glenarm and Carnlough in the north east. While there are no wind farms in the *immediate* vicinity of Unshinagh – the wider landscape includes other developments – with other potential wind farms also proposed in the AONB including Ballygilbert (LA02/2020/0458/F and Carnalbanagh (LA02/2017/0594/F). I therefore consider cumulative impacts to be an existing issue that could be exacerbated by other proposals in the pipeline.

3.40 The SPPS states at para 6.187 that development proposals in the AONB must be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife, and be in accordance with relevant plan policies. Additionally under Renewable Energy, para

6.223 advises that 'a cautious approach for renewable energy development proposals will apply within designated landscapes which are of significant value, such as areas of Outstanding Natural Beauty ...and their wider settings. In such landscapes it may be difficult to accommodate renewable energy proposals, including wind turbines, without detriment to the region's cultural and natural heritage assets.' Para 6.224 goes on to state that 'development that generates energy from renewable resources will be permitted where the proposal and any associated buildings and infrastructure, will not result in an unacceptable adverse impact on the following planning consideration: visual amenity and landscape character.'

3.41 In terms of MEABC's Plan Strategy, **Policy CS1 Sustainable Development in the Countryside** advises that opportunities for development in the countryside are permitted through the following policies:

- Renewable Energy proposals in accordance with Policy RE1

All proposals must satisfy the requirements of the relevant policy (or policies) and must meet the General Policy.

3.42 **Policy CS3 identifies 6 Areas of Constraint on High Structures** (ACHS), including 'Eastern Garron Plateau and Scarp Slopes' ACHS which is affected by this proposal. In summary this policy contains 3 graduated height criteria or bands for tall structures (including wind turbines) of up to 15 metres, 15 – 25 metres and structures above 25 meters. Structures above 25 metres in height will only be permitted where it can be demonstrated that the following 4 criteria are met:

- a) the structure does not interrupt key views from public vantage points;
- b) there is a need for a structure of this height;
- c) there are no suitable alternative sites located outside the designated area; and

d) appropriate mitigation measures are in place to minimise the impact of the proposed development on the designated area

and that the proposal is of such regional significance as to outweigh any detrimental impact on the landscape character, any distinctive landscape feature and/or heritage interest in the designated area. The Justification and Amplification (J&A) at paragraph 5.9.27 states that structures that exceed 25 metres in height will only be granted permission in exceptional circumstances where it can be demonstrated that they are of such regional importance as to outweigh any adverse impact within the designated area and if policy tests a) – d) are met.

3.43 Policy CS5 Antrim Coast and Glens AONB advises that proposals within the AONB will only be permitted if there is no adverse or cumulative impact on its exceptional landscape quality, distinctive character, heritage and wildlife which would prejudice its overall integrity. Development proposals within the AONB must meet the General Policy, accord with other provisions of the LDP and meet all of the additional 6 criteria which include:

- a) the nature and intensity of the proposed use is compatible with the landscape and distinctive character of the AONB;
- b) in the case of buildings, the proposed development is sited and designed so as to integrate with the landscape and, where feasible, to enhance the landscape quality;
- e) public views of key features, ridge lines and coastal headlands within the AONB are protected.

3.44 Para 5.9.32 details the objectives of the AONB designation. Para 5.9.33 explains Policy CS5 seeks to protect, preserve and where possible enhance the scenic quality and character of the AONB.

3.45 Chapter 9.3 Renewable Energy acknowledges that renewable energy developments must be accommodated in order to meet demand and

regional targets, whilst also protecting the environment and sensitive landscapes. The policy aim is 'to facilitate renewable energy development in appropriate locations within our borough, whilst balancing the recognised benefits against any potential environmental or social impacts.'

3.46 Policy RE1 Renewable Energy Development states that RE developments and any infrastructure will be permitted where it meets the General policy and accords with other provisions in the LDP. Additionally it must meet an additional 8 criteria including:

a) it will not have an unacceptable adverse impact on visual amenity or landscape character including the cumulative effect of development on the landscape;

3.47 Policy RE1 reiterates the terminology used in the SPSS cited above whereby it acknowledges that a cautious approach will apply in distinctive landscape areas and that certain types of renewable proposals will be restricted within ACHS. The wider environmental, economic and social benefits of all proposals are material considerations that will be given appropriate weight in determining if planning permission should be granted for renewable energy proposals. The policy aims to facilitate renewable energy development within appropriate locations in the borough.

3.48 Overall the impacts of this proposal are considered to be significantly adverse in terms of their effect on landscape character and visual amenity at this location in the AONB. The proposed development would be out of scale with the receiving landscape and result in a dominant and overbearing influence on its key characteristics. In terms of the AONB and this location within it, the majority of the numerous and geographically extensive view points indicate that the receiving landscape does not have the carrying capacity to accommodate development of this size and scale without significant detriment to visual

amenity and landscape character. I consider that the scenic quality of the AONB would be compromised and that the proposal would be inconsistent with the cautious approach to wind energy development advocated in the SPPS and the Plan Strategy. NIEA NED Protected Landscapes Team are of the opinion that the proposal for 14 turbines at this location within the Antrim Coast & Glens AONB would have an unacceptable and significant adverse impact on both the visual amenity and landscape character of the area, would thereby impact negatively on the immediate and wider AONB landscape and also perceptions and experience of the visual receptor and would be contrary to associated planning policy.

- 3.49 Accordingly, I consider that this development would have an unacceptable adverse impact on the visual amenity and landscape character of this location within the AONB through the number, scale, size and siting of the turbines and thus is contrary to paras 6.222-6.224 of the SPPS and Policies GP1(a), CS1, CS3, CS5 and RE1 of MEABC Plan Strategy.

Tourism

- 3.50 One of the aims of RDS 2035 is to support villages and rural communities to maximise their potential in terms of rural recreation and tourism. RG 4 seeks to promote a sustainable approach to the provision of tourism infrastructure with paragraph 3.7 referring to the advantages of doing so including health benefits for a more active resident population motivated to explore Northern Ireland's tourism assets. Para 3.29 sets out the valuable contribution that historic sites and landscapes make to the tourism economy. The Antrim Coast and Glens are identified on Diagram 2.3 as a Strategic Natural Resource.
- 3.51 The SPPS (para 6.251) acknowledges the vital contribution tourism makes to the local NI economy. Paras 6.252 and 6.253 cross-reference to other strategic policy that illustrate it is seen by the Executive as one

of the building blocks to underpin its priority of growing sustainable economy and investing in the future. One of the regional strategic objectives listed at 6.356 is to safeguard tourism assets from inappropriate development.

MEABC Plan Strategy SGS8 Tourism Strategy

3.52 The Council's Tourism Strategy aims to use the significant potential of the Causeway Coastal Route and the area's natural and historic assets to create a strong tourism brand identity and create a compelling package for attracting visitors. Accordingly, SGS8 'Tourism Strategy' contains 5 elements. Of direct relevance to this application is the first of these elements, the 'Protection and safeguarding of key tourism assets'. This aims to ensure that key tourism assets (described as significant features of the natural and historic environment that attract, or have the potential to attract, tourists) are protected, conserved and, where possible, enhanced. This element of the strategy is delivered through policy TOU1.

3.53 **Policy TOU1 'Safeguarding Tourism Assets'** seeks to protect tourism assets in furtherance of the Tourism Strategy. Policy TOU1 states that planning permission will not be granted for development that would, in itself or in combination with other existing and approved developments in the locality, have an adverse impact on a tourism asset such as to significantly compromise its amenity, setting or tourism value. The policy provides for the safeguarding of all tourism assets including those which are subject to protection for other reasons under various legislative or policy instruments and those which are not subject to such protection. Examples of tourism assets provided in the J&A include the Causeway Coastal Route, the Antrim Coast and Glens AONB and conservation areas.

3.54 While it is acknowledged that recreation and tourism are important elements of the NI economy, para 1.3.80 of the Best Practice Guide that accompanies PPS 18 (and which the Plan Strategy says will continue to

be taken into account in assessing proposals) states such things are not necessarily incompatible with renewable energy. Para 1.3.81 provides that for future wind farms, the judgement of acceptability based on landscape protection should provide adequate protection to such tourism assets as the threshold of landscape protection is generally more sensitive to wind farm development than tourism.

3.55 Significant tourism features in this general locality include the Antrim Coast and Glens AONB, the Causeway Coastal Route, the attractive villages of Glenarm, Carnlough and the Glenarm Scenic Route. The letters objecting to the proposal refer to the potential negative impact on tourism including walking, hiking and film tourism.

3.56 Therefore, as I have concluded that the proposal will have an unacceptable adverse impact on the landscape character and visual amenity of the locality, it is my opinion that the proposed development would significantly compromise the tourism value of the many tourism assets, including the Antrim Coast and Glens AONB and is therefore contrary to policy TOU1 of the MEABC Plan Strategy.

Ecology and Natural Heritage Issues

3.57 With regards to ecological and natural heritage matters the relevant policy context is the Strategic Planning Policy Statement for Northern Ireland (SPPS) (paras 6.179 - 6.193), and Policies GP1 (a and e), RE 1(e), NAT1, NAT2 and NAT5 of the MEABC Plan Strategy. The main thrust of these policies is that there is a presumption in favour for development from renewable resources provided that it will not result in unacceptable adverse impacts with regards ecology and biodiversity and where this is unavoidable, appropriate mitigation and/or compensatory measures will be required.

3.58 The application site is within, adjacent and hydrologically linked to the following national, European and international designated sites:

- Antrim Hills SPA (Hen Harrier & Merlin)
- Garron Plateau SAC;
- Garron Plateau ASSI

3.59 Regarding habitats, the proposed site is located on the southern slopes of the Garron Plateau. Much of the site consists of neutral grassland and species poor marshy grassland which has experienced significant grazing pressure. However, NI Priority habitat and habitats of biodiversity value are also present, sometimes in mosaic with other less sensitive and protected habitats. The NI Priority Habitats which will be impacted include Purple Moor- grass and Rush Pasture, Hedgerows, Mixed Ashwoods, Upland Heathland and Blanket Bog.

3.60 NED is content that risks to the following species as a result of the proposal have been adequately considered in the ES and impacts appropriately mitigated, subject to appropriate planning conditions if approval is recommended – bats, otters, badgers, common lizard, smooth newt, red squirrel, pine marten, marsh fritillary butterfly, argent & sable moth.

3.61 **Ornithology**

NED Ornithology has serious concerns with this proposal and considers that it may have significant adverse impacts on bird features of international, national and natural heritage importance – particularly in relation to the following:

- The impacts that the proposed windfarm may have on the important population of breeding Curlew in the Antrim Hills area, one of the few remaining strongholds for this NI Priority species.

- The local Curlew population in the area of this proposal (4-8 pairs representing 6-20% of the Antrim Hills population) is a key constituent part of the wider Antrim Hills-Glenwherry population which currently supports a nationally important population of breeding Curlew, one of only a few remaining strongholds for Curlew in Northern Ireland and one of the most important breeding Curlew sites in the island of Ireland.
- The windfarm is located within the Antrim Hills SPA, which is currently designated for both breeding Hen Harrier and Merlin. These species have historically used this area, and a management plan is being implemented to restore these protected features to favourable conservation status. The development of a windfarm in this location has a potential to significantly impact these declining species through further fragmentation of suitable nesting and foraging habitat.
- NIEA is currently considering an extension to the Antrim Hills SPA site boundary in order to protect the nationally important Curlew population in this area – this incorporates much of the same area as the proposed development.

3.62 RSPB has objected to the proposal and has serious concerns with regard to impacts on breeding curlew populations, snipe and hen harrier. They provide details on the breeding records, vantage point surveys and methodologies, collision risk assessments and cumulative effects. RSPB point to the applicant's own acknowledgement of the significance of this area for breeding curlew (Para 7.107 of the ES). Their concerns relate to how this particular application may impact the population of curlew in the wider Antrim Hills area and given the known impacts of windfarms on these birds. Hen harriers are an Annex 1 species under the EU directive and of medium conservation concern in Ireland and snipe is listed in Birds of Conservation Concern. Overall RSPB object to the proposal as it may have the potential to significantly impact on the breeding population of curlew in NI through loss of habitat and the absence of any mitigation measures that are scientifically accepted to be effective. Concerns are also raised on the potential impact on breeding snipe in

the absence of any mitigation measures that are scientifically accepted to be effective; and additional matters in relation to hen harriers where a precautionary approach should be adopted.

Habitats

3.63 NIEA acknowledge that the assessment of the presence of active peat was used to inform the layout of the wind farm and that attempts have been made to avoid habitats of conservation significance. However, the ES states that the proposed development will result in the permanent loss of degraded blanket bog, heath and purple-moor grass and rush pasture habitats totalling 7.33ha with a further temporary loss of 2.86ha for spoil storage during construction. The ES includes an outline Habitat Management Plan (oHMP) which aims to provide details to compensate for the loss of habitats. NED has concerns with the Outline Habitat Management Plan (oHMP) and recommend that further information or amendments are required in order for the proposed development to comply with NAT5:

- Management measures for compensating for the loss of habitats need to be applied on the parts of the site where these actions would have the greatest beneficial impact, rather than being restricted to wet acid grassland which is to be managed for Curlew (Management Block A) and two blocks of coniferous forestry in the southwest which will include access track (Blocks B & C).
- The Rush Management section of the oHMP needs to provide information as to how water level will be raised immediately after cutting, who will have responsibility for oversight of timings or the practicalities of achieving this.
- The Rush Management section of the oHMP needs to provide details of the criteria for use of herbicides to control rushes, in particular the reasoning for their use in future monitoring reports where all other management approaches have proven to be ineffective.
- The list of Detailed Specific Measures in the Land Management for Curlew section of the oHMP uses unenforceable non-modal language.

Terms such as 'should be' and 'may be' need to be changed so that they are enforceable.

- The proposed drain blocking methodology needs to provide evidence that a responsible person with adequate expertise will be employed to deliver water level maintenance over the required areas and the adjustments to water levels that are proposed through the year.
- NED-DMT has concerns that monitoring water levels bi-annually for three years will not provide the frequency of data to inform the water level management proposed for Block A. NED-DMT will require more detail on how the water-table will be monitored in sufficient detail to facilitate the seasonal changes at Block A and drain blocking decisions on the former plantation, how often monitoring will happen and how changes to water level will be triggered.

The stated time-period of three years would also not be sufficient to inform the peatland restoration at former plantation sites.

- Section 7 of the oHMP sets out the proposals for monitoring the progress towards achieving the criteria for success. NED-DMT recommends that other environmental variables are also recorded during quadrat monitoring, including evidence of negative management such as grazing pressure, fertiliser application, presence of dung and an estimate of ground wetness.
- Adherence to the land management prescriptions proposed for mitigation and compensation must be achieved by a legally binding agreement.
- NED-DMT considers that plans for the restoration of peatland do not provide sufficient evidence that active peatland will successfully establish with appropriate vegetation colonisation and stabilisation of a near surface water table.
- NED-DMT require details of the impact of access track construction and maintenance on the habitat management aims within the habitat management blocks

3.64 Accordingly, I consider that the proposed application is likely to have unacceptable adverse impact on, or damage priority habitats and would therefore be contrary to paras 6.192 and 6.224 of the SPPS and Policy NAT 5 of MEABC Plan Strategy.

Fisheries

3.65 DAERA Inland Fisheries (IF) notes the nature and location of the wind farm and its associated infrastructure – particularly in relation to the Ticloy River and the Glencloy Rivers and their associated catchments. These catchments contain populations of important nature conservation and biodiversity value (salmon, trout, eel, lamprey) which are sensitive to reductions in water quality both at the site and at distances downstream. IF main concerns relate to the potential for release of sediments during construction phase. They also express concern regarding the potential for the river crossings (some 20 in total) proposed to fragment habitats and create barriers for mobile species. They consider that further investigation is required to ensure free movement of fish and minimisation of loss of habitat.

3.66 Shared Environmental Services (SES) have carried out an appropriate assessment on behalf of the Department in accordance with Regulation 43 (1) of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended). SES advise that it cannot be certain, beyond reasonable scientific doubt, that this proposal will not have lasting adverse effects on the integrity of Antrim Hills SPA in light of the conservation objectives for this European site. Their reasoning for this conclusion is that Turbines T7, T9, T12 and T13, their access roads, crane hardstandings and the other associated infrastructure required to connect them to the electricity grid are located within the Antrim Hills SPA, which has been designated for its internationally important populations of Hen Harrier (*Circus cyaneus*) and Merlin (*Falco columbarius*).

3.67 As this project is likely to have a significant effect on one or more European sites it was therefore subject to appropriate assessment. The appropriate assessment concluded that it cannot be certain, beyond reasonable scientific doubt, that this project will not have lasting adverse effects on the integrity of one or more European sites. Approval of this project would not comply with Regulation 43 of the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) or meet the policy requirements of Policy NAT1 of MEABC 2030 Plan Strategy. No evidence has been provided to demonstrate that any of the exceptional circumstances detailed below in NAT1 apply.

In exceptional circumstances, a development proposal which could adversely affect the integrity of a European or Ramsar Site may only be permitted where:

- i. there are no alternative solutions; and
- ii. the proposed development is required for imperative reasons of overriding public interest; and
- iii. compensatory measures are agreed and fully secured.⁶⁴

In such exceptional circumstances, where a European or Ramsar site hosts a priority habitat or priority species listed in Annex I or II of the Habitats Directive, a development proposal will only be permitted when:

- it is necessary for reasons of human health or public safety or there is a beneficial consequence of primary importance to the environment; or
- it is agreed in advance with the appropriate authority.

3.68 DfI Regional Planning Policy and Casework Directorate has reviewed the appropriate assessment provided by SES and in its role as the competent Authority under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), and in accordance with its duty under Regulation 43, has adopted the HRA report, and conclusions therein, prepared by SES, dated 30/11/2023. This found that that it cannot be certain, beyond reasonable scientific doubt, that the proposal will not have lasting adverse effects on the integrity of one or more European sites.

3.69 Accordingly, I am of the opinion that in relation to ecology and natural heritage interests and in particular ornithology, European site interests

and priority habitats, that the proposal does not accord with the SPPS (paras 6.179 - 6.193), and Policies GP1 (a and e), RE 1(e), NAT1, NAT2 and NAT5 of the MEABC Plan Strategy.

Peat Slide Risk

3.70 A peat slide risk assessment (PSRA) has been provided at Appendix 9.3.1 of the ES. Geological Survey NI (GSNI) advise that the PSRA has been performed to the appropriate level and that the necessary control measures identified will be followed to ensure that the risk of peat slide remains at a low level. GSNI however, requires that plans for the stockpile designed for the temporary storage of peat is submitted for consideration prior to any approval. NED have no concerns regarding peat slide provided the recommendations in Sections 8 to 8.3 of the peat slide risk assessment are included in and adhered to in a final CEMP, which shall include the recommended further investigations. Additionally NED also advise that the proposals outlined in the Peat Management Plan, in particular the handling, appropriate storage of excavated peat and monitoring of success, to be detailed in the final CEMP if planning permission is forthcoming.

Flood Risk Assessment

3.71 The northern site boundary is just south of Craigfad Loughs and the entire site is affected by numerous various sized watercourses, rivulets, waterfalls and marsh/pond land including Currigyohil Loughs within the red line.

3.72 DfI Rivers has reviewed the application further given that the Plan Strategy has now been published and advise no further comments in accordance with the policies contained within MEABC Local Development Plan 2030 Plan Strategy (LDP). In summary, DfI Rivers has no reason to sustain an objection to this application.

Archaeology

3.73 HED (**Historic Buildings**) has considered the application and on the basis of the information, despite a slight adverse impact on a number of listed buildings do not consider this sufficiently detrimental to substantially reduce or negate their significance.

3.74 HED (**Historic Monuments**) has concerns regarding the impact of this proposal upon the integrity of the settings of several regionally significant archaeological monuments, and upon the archaeological potential of the proposed development area. The settings of regionally significant archaeological sites and monuments are protected by paragraph 6.8 of the SPPS and MEABC Plan Strategy Policy HE1 – Archaeological Remains and their Settings. Given the nature of this proposal, Policy RE1 (e) of MEABC Plan Strategy also applies.

3.75 It is considered that the Environmental Statement does not adequately assess the potential impact of the development upon the known archaeological assets nor the archaeological potential of the area given the magnitude of the proposal. In the absence of further archaeological assessment HED (Historic Monuments) advises that the proposal is contrary to planning policy.

3.76 Accordingly I am of the opinion that the application as submitted fails to comply with para 6.8 of the SPPS, Policy HE1 – Archaeological Remains and their Settings and Policy RE1 (e) of MEABC Plan.

Roads and Traffic

3.77 DfI Roads advise that they have reviewed Chapter 11 (Traffic & Transport) ES and the Design and Access Statement and that the content of these is acceptable to them. However, they require further information to progress the assessment of the application including scaled plans and surveys for the site access works, details of abnormal

roads delivery, engineering works required for widening at The Sheddings, and details of swept path analysis. This detail would require to be submitted and assessed prior to any decision issuing if it was determined that the application was acceptable in principle.

Council Opinion

3.78 MEABC advise that as previously highlighted in their August 2022 consultation response, the proposed windfarm is located wholly within the Antrim Coast and Glens Area of Outstanding Natural Beauty which was designated because of the scenic quality of its landscape and the appeal of the heritage of the dwellings built by past generations. The AONB comprises part of the scenic Causeway Coastal Route, which is a significant tourist asset in the region. The site of the proposed windfarm also lies approximately 5km to the southwest of Carnlough and 5km west of Glenarm, both of which are designated Conservation Areas due to their historic and vernacular buildings and their locations within this high quality landscape. The Council remain concerned that the visual impacts of a windfarm, comprising 14 turbines (of approximately 180m in height), would detract from this high quality landscape and adversely affect the unique characteristics of the two settlements and the Conservation Areas in Carnlough and Glenarm. Consequently, the Council would also be concerned that these detrimental visual impacts would affect the tourism assets and visitor attraction to the area.

3.79 The site for the proposed windfarm is also located partly within the Eastern Garron Plateau and Scarp Slopes Area of Constraint on High Structures (ACHS), as defined within the Council's adopted Local Development Plan 2030 - Plan Strategy. At least five of the turbines are within the ACHS. Council considers if the windfarm was approved, that decision would prejudice this designated ACHS and undermine Policy CS3 which seeks to protect the distinctive and vulnerable landscapes and the assets associated with the natural and historic environment of these areas. Council would highlight that Policy RE1 also points to the other relevant provisions of the LDP as well as General Policy GP1 for

consideration of this renewable energy proposal. As well as Countryside policies such as Policy CS1 – Sustainable Development in the Countryside; Policy CS3 – Area of Constraint on High Structures; and Policy CS5 – Antrim Coast and Glens Area of Outstanding Natural Beauty, Natural Heritage policies also apply, especially given the location of various European and International sites either intersecting, or adjacent to, this proposed application site, such as Garron Plateau ASSI, Garron Plateau SAC and Antrim Hills SPA. In addition, other policies to be considered also include the Built Environment policies, Flood Risk and Drainage policies, Tourism policies and Policy TEI1 – Telecommunication and Electricity Infrastructure.

4.0 CONCLUSION

4.1 After fully assessing the development proposal and the consultation responses, and having regard to the relevant planning policy context, the statutory development plan and all other relevant material considerations, the following conclusions have been reached;

- The proposal has the potential to contribute to wider government environmental and economic strategic objectives and will contribute to Northern Ireland current target to derive 70% of its electricity consumption from a diverse mix of renewable resources by 2030 as set by DfE in the Energy Strategy – The Path to Net Zero Energy and the more ambitious target of 80% renewable energy by 2030 towards achieving carbon net zero by 2050 set by the Climate Change Act (Northern Ireland) 2022.
- The landscape and visual impact of the wind farm is considered to be significantly adverse particularly in terms of the effect on the Antrim Coast and Glens AONB and contrary to the SPPS and policies RE1, CS3 and CS5 of MEABC Plan Strategy.

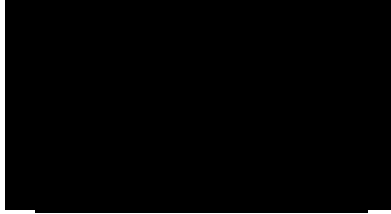
- The significant and adverse impacts are also considered to be contrary to policy TOU1 – Safeguarding of Tourism Assets of MEABC Plan Strategy.
- The proposal is contrary to the SPPS (paras 6.180 & 6.192), and Policies GP1 (a and e), RE 1(e), NAT1, NAT2 and NAT5 of the MEABC Plan Strategy in terms of impacts on nature and conservation interests.
- The proposal has not demonstrated that it complies with policy HE1 of the Plan Strategy and RE1(c), para 6.8 of the SPPS in terms of impacts upon the integrity of the settings of several regionally significant archaeological monuments and the upon the archaeological potential of the proposed development area.
- The proposal has not demonstrated that it complies with MEABC Plan Strategy Policy RE1(b) in terms of impacts on amenity arising from noise.
- As set out above, the positive and negative impacts of the proposal must be weighed and balanced in reaching a decision on this application. I have taken account of the general wider environmental, economic and social benefits that a proposal of this nature can bring.

5.0 RECOMMENDATION

5.1 Section 29(1) of the Planning Act (NI) 2011 empowers the Department to request that the Planning Appeals Commission or other appointed person hold a public inquiry for purposes of considering representations on the application. The alternative is to serve a Notice of Opinion on the applicant and the council indicating the decision which the Department proposes to make on the application.

- 5.2 The Department may cause a local public inquiry to be held where it is considered that the inquiry will provide additional information to inform the Department in making a final planning decision. The key test for the Department in deciding the process route is whether a public local inquiry is necessary to provide a forum for presentation and consideration of issues arising from the representations received and which need to be assessed to allow the Department to determine the application. In this case it is considered that a public inquiry is not required to consider representations on the application and that a Notice of Opinion be issued.
- 5.3 The proposal has been considered having regard to the information submitted in support of the development, all relevant material considerations including third party representations, other documentation submitted with the application including the environmental statement (ES), ES Addendum, the relevant planning policies, and the views of bodies with environmental responsibilities. Having weighed all the considerations it is recommended that the application, on balance, should proceed by way of a Notice of Opinion to refuse planning permission. A Draft Notice of Opinion is attached (Appendix 7)

SECTION 26 REPORT

Application No:	LA02/2021/1205/F
Proposal:	Proposed wind farm comprising 14 three-bladed, horizontal axis wind turbines, each up to a maximum of 180m to tip height, associated external electricity transformers; underground cabling; a newly created site entrance; access tracks; turning heads; crane hardstandings; control building and substation compound, 4 battery energy storage containers, tree felling, off-site areas of widening to the public road and all ancillary works. During construction and commissioning there would be a number of temporary works including a construction compound with car parking; temporary parts of crane hardstanding's and welfare facilities.
Location:	The application site is located approximately 5km to the South West of the village of Carnlough Village and 5km west of Glenarm, Co. Antrim in the townlands of Drumourne Unshinagh Mountain, Unshinagh South, Ticloy, Slane, Cregcattan (part of Galdnagh) and Aughareamlag. The proposed site entrance is located to the eastern boundary of the site and is approximately 150m north of Doonan Leap Car park. The southern boundary of the site is approximately 380m from the Slane Road with the northern site boundary approximately 2.4 km from the village of Carnlough.
The above application was considered at a development control group meeting:	
DC Group recommendation:	Notice of Opinion to Refuse
Group Signatures:	 Date: 8 December 2023

Appendix 1 – Process History

This is a full application for 14 turbines up to a maximum height of 180 metres to tip height and ancillary development including 4 battery energy storage containers. All turbines and development is within the Antrim Coast and Glens AONB. The application was submitted on 22 December 2021 but was invalid until 22 February 2022.

A voluntary Environmental Statement (ES) was submitted with the application providing detailed information on all the potential environmental impacts of the site and how these have been considered or mitigated by the applicant.

The Department issued a formal request for Further Environmental Information (FEI) under the EIA Regulations on 22 March 2021 in relation to the Battery Energy Storage System (BESS) element. An Addendum submitted on 01 June 2022 allowed the Department to undertake advertisement of the ES and Addendum in accordance with The EIA Regs (2017).

I am satisfied that the application has been processed in accordance with the relevant legislation and procedural requirements.

Appendix 2 – Relevant Site History

Reference Number	Site Description	Site Location	Date submitted to DFI
LA02/2021/0939/DETEIA	Intention to submit Environmental Statement for Proposed Unshinagh Wind Farm comprising 14 three-bladed horizontal axis wind turbines, each up to a maximum of 180m tip height associated external electricity transformers; underground cabling; a newly created site entrance; access tracks; turning heads; crane hardstandings; control building and substation compound, energy storage containers, off-site areas of widening to the public road and all ancillary works. During construction and commissioning there would be a number of temporary works including a construction compound with car parking; temporary parts of crane hardstandings; welfare facilities and temporary guyed meteorological masts.	Drumourne, Unshinagh Mountain, Unshinagh South, Ticloy, Slane, Cregcattan (part of Galdanagh) and Aughareamlag, approximately 4 km south west of the village of Carnlough village Co. Antrim.	13 September 2021

Appendix 3 – Summary of Consultation Responses Received

In processing the application the following bodies were consulted upon receipt of the application/ES and subsequently upon receipt of any amended drawings/relevant FEI.

No objection/Approval subject to conditions

- Arqiva
- NIE Networks
- JRC on behalf of NIE Links
- BT
- Eircom UK
- PSNI
- Vodafone (C&W) No objection on behalf of NIE/SONI
- NI Water Strategic Applications
- NI Water – Wind Farms
- DfE Energy Branch
- BIA
- George Best BCA
- NATS
- DIO LMS & Safeguarding
- Loughs Agency
- NITB – No comment – refer to Council
- MP&E
- Honourable Irish Society
- CAA – Safety and Airspace Regulation Group (DAP)
- NIFRS
- HSENI
- GSNI
- EMR Solutions
- DFI Rivers
- SONI

No Response

- Countryside Management
- MII Telecoms
- Mobile Broadband
- Network Repeater
- MW Electronics
- Hutchinsons
- DAERA Forestry
- EE

FEI/Object/Refuse

- DfC HED
- Mid and East Antrim Borough Council
- MEABC EHO - FEI Required
- Economics Branch – potential overly optimistic assessments need verification
- RSPB – concerns re Curlew, Snipe, Hen Harrier, and surveys and mitigation
- DfI Roads – drawings required
- DAERA - NIEA
- SES

Appendix 4 – Planning Policy Context

- Regional Development Strategy (NI) 2035 (RDS)
- Strategic Planning Policy Statement for Northern Ireland (SPPS)
- MEABC Plan Strategy
- Larne Area Plan 2010
- Ballymena Area Plan 1986-2001
- SPG and BPG (that accompany PPS 18 - Renewable Energy)

Appendix 5 – Summary of Third Party Representations

Letters of Objection

In total there are 6 letters of objection (as of 08.12.2023) as summarised below:

- Contrary to NH5 of PPS 2, para 6.181 and 6.192 of SPPS due to potential significant effects on curlew, snipe and Hen Harrier, lack of scientifically proven mitigation, concerns regarding methodology/surveying, lack of collision risk assessment, insufficient assessment of cumulative impacts
- Impacts of turbines and ancillary development on AONB.
- Development site will impact over large area – degrade the scenic views in an area recognised for its scenic quality and wilderness aesthetic.
- Scale and massing will affect wilderness over a wide area beyond immediate site.
- Impact on Ulster Way, Antrim Hills Way, International Appalachian Way, and local walking routes (area particularly important during pandemic)
- Detracts from qualities for walkers/hillwalkers
- Cumulative effects of other existing and proposed wind energy developments in the locality will reduce visual amenity.
- Impacts on tourism in locality including Carnlough, Slemish, Big Trosk and Little Trosk.
- Walking and tourism (including Film tourism) benefit rural areas that will be negatively affected by the development.
- Potential damage to peatlands, flora and fauna
- Effect of cumulative impacts – also those referred to are smaller scale in less sensitive locations
- Damage to recreational experiences (hill walking/driving routes/cycling routes etc)
- Illogical to impact on bog that is already a natural carbon store
- Any benefits are negated by the considerable harm
- Contrary to support renewable developments but only in the right locations that don't negatively impact on scenic/sensitive/tourist areas (e.g. offshore)

Letters of Support

The Department has received 1 letter of support (as of 08.12.2023) summarised as follows:

- Resident of Carnlough believes renewables are needed to negate effects of fossil fuels and to lower energy prices. A 'view' should not over-ride the importance of renewables.

Appendix 6 - Regulation 24 Reasoned Conclusion

The proposed project is for a windfarm comprising 14 three-bladed, horizontal axis wind turbines, each up to a maximum of 180m to tip height, associated external electricity transformers; underground cabling; a newly created site entrance; access tracks; turning heads; crane hardstandings; control building and substation compound, 4 battery energy storage containers, tree felling, off-site areas of widening to the public road and all ancillary works. During construction and commissioning there would be a number of temporary works including a construction compound with car parking, temporary parts of crane hardstanding's and welfare facilities.

The proposed windfarm constitutes a "project" listed within Annex II to the EIA Directive [Directive 2011/92/EU as amended by Directive 2014/52/EU]. An ES was voluntarily submitted by the Applicant.

An assessment of compliance of the proposed wind farm with the objectives and requirements of the EIA and associated national regulations, considered the following reports and supporting information that formed part of the application package:

- ES, FEI and Appendices
- ES Non-Technical Summary

The Department has examined the environmental information. The examination involved whether the EIA process identified, described and assessed the direct and indirect effects of the Project. This involved an examination by the Department of both the information supplied by the applicant and the feedback provided by consultation responses. Consultation responses are available in full on the planning portal and are summarised in this Development Management Report (DMR).

After the examination undertaken by the Department, the main likely significant effects and mitigation measures (where required) of the proposed development on the environment are as follows:

Landscape and Visual

The turbines would be located on upland grazing land between the townlands of Unshinagh and Ticloy on the Garron Plateau uplands to the south east of Cleggan Forest and below the summits of Berry Hill, Binnagee and Neill's Top. The development would have significant landscape and visual effects in some instances including significant direct physical effect this part of the AONB (Para 4.232) and on the LCA within which it is located. The development would also have indirect effects on the setting of 4 other LCAs and SCAs although the ES deems these to range from medium to negligible.

Mitigation at para 4.226 includes the standard finishes to turbines, ancillary facilities located on lower lying ground and the new access will involve the partial removal of a small bank of existing trees which will be mitigated by proposals to create a new belt of mixed woodland on the southern side of this embankment, and to extend an existing belt of Scots Pine on the northern side to ensure that the site entrance and access track will steadily become more screened from view as the planting establishes and matures.

Ecology

The ES identifies the potential for a significant effect on bats during the operational phase of development (Table 6.14). Mitigation is detailed at paras 6.300-6.324. Common Lizard and Smooth newt are identified as species with a potential moderate adverse impact during construction and decommissioning. NIEA NED is content the risks to bats, lizards and newts have been adequately considered and appropriately mitigated.

Ornithology

The ES concludes that for most bird species (& the Antrim Hills SPA) it is unlikely that the proposed development will have an adverse impact. In terms of Snipe, the displacement of 1-2 pairs is possible and losses cannot be excluded. The ES advises these losses would probably be significant at the local population level. For curlew the ES advises that potential displacement of one pair is likely to be significant for the Antrim Hills curlew population.

Proposed mitigation measures are summarized in Table 7.27 and include habitat management, an Ornithological Mitigation Strategy (OMS) and an Ornithological Management & Monitoring Plan (OMMP). The ES considers that the mitigation measures including the proposed habitat compensation area for curlew and snipe is substantial in size and therefore is expected to at least adequately compensate for the potential displacement of birds as well as having a likely beneficial effect for these species. And others including foraging hen harriers.

NIEA NED and RSPB both have significant concerns regarding the proposal and considers that it may have significant adverse impacts on bird features of international, national and natural heritage importance – particularly in relation to impacts on the important population of breeding Curlew in the Antrim Hills area, the Antrim Hills SPA and its designated species of Hen Harrier and Merlin and the potential to significantly impact these declining species through further fragmentation of suitable nesting and foraging habitat. They also question the absence of any mitigation measures that are scientifically accepted to be effective.

Fisheries

The ES identifies the potential for significant effects of the development on the fish stocks and fish habitats on a number of receiving watercourses including the Ticloy Waters and Glencloy River (see Table 8.14). Potential impacts are primarily related to sediment runoff and the release of other pollutants to the receiving watercourses with related effects on fish stocks/temporary obstruction of fish passage. Effects are most likely during the construction and decommissioning phases.

Mitigation is detailed at paras 8.8.208 - 8.223 and deals with sediment runoff, buffer zones, timing of works, surface water management, water quality monitoring, release of other pollutants, site management and surface water management. The ES concludes that post mitigation, significant effects are unlikely. (See Tables 8.15, 8.16 & 8.17 for construction, operation and decommissioning summaries).

DAREA IF has highlighted their concern regarding sedimentation particularly during construction and also fragmentation of habitats through barriers and river crossings.

Geology and Water Environment

Likely significant effects identified in Chapter 9 include:

- chemical pollution of the watercourse (Glencloy Rover and Ticloy Water) through spillage of oils, chemicals, or cementitious material associated with temporary construction; Changes in runoffs and flow patterns; changes to water quality. Without design and mitigation, the development would likely cause adverse effects on the water environment due to the hydrological link between the development and watercourses with significant fisheries interests. Mitigation measures integrated as part of the design and others to be implemented throughout the lifetime of the development include careful design measures in terms of positioning of turbines, foundations etc, avoidance of significant water features, buffer zones, management of minor water features/new infrastructure areas, surface water management plan (SuDS, silt management, reduce risk of flash floods) and pollution prevention procedures.

NIEA Water Management Unit has considered the impacts of the proposal on the surface water environment and is content subject conditions and adherence to standing advice. IF has expressed concern in relation to fisheries interests.

Archaeology

The applicant has assessed the potential for both direct and indirect effects on heritage assets and has concluded there will be no significant adverse effects arising from the development. HED (Historic Monuments) consider that the ES does not adequately assess the potential impacts and advises that further archaeological assessment is required in order to fully clarify the potential impacts particularly given the magnitude of the proposal (i.e. a large-scale proposal of 14 turbines, 12km of new access tracks, drainage works, grid connections, energy storage containers, hardstandings and ancillary works etc.) Therefore greater clarity regarding the impacts upon the recorded and unrecorded archaeological assets need to be provided by the developer to permit an informed and reasonable planning decision to be taken.

Accordingly the potential for significant effects on cultural heritage interests exists and has not been sufficiently addressed at this time.

Appendix 7 – Notice of Opinion

NOTICE OF OPINION REFUSAL OF PLANNING PERMISSION

Planning Act (Northern Ireland) 2011

Application No: **LA02/2021/1205/F**

Date of Application: **22 December 2021**

Site of Proposed Development:

Lands approximately 5 kilometres south west of Carnlough and 5 kilometres west of Glenarm, Co. Antrim, in the townlands of Drumourne, Unshinagh Mountain, Unshinagh South, Ticloy, Slane, Cregcatten (part of Galdanagh) and Aughareamlag. The proposed site entrance is located to the eastern boundary of the site and is approximately 150m north of Doonan Leap Car Park. The southern boundary of the site is approximately 380m from the Slane Road, with the northern boundary approximately 2.4km from the village of Carnlough.

Description of Proposal:

Proposed windfarm comprising 14 (three-bladed) horizontal axis wind turbines, each up to a maximum height of 180 metres to tip height, associated external electricity transformers, underground cabling, newly created site entrance, access tracks, turning heads, crane hardstandings, control building and substation compound, battery energy storage containers, tree felling, off site areas of widening to the public road and all ancillary works. During construction and commissioning there will be a number of temporary works including a construction compound with car parking, temporary parts of crane hardstandings and welfare facilities.

Applicant RES Ltd
: Unit C1 & C2
Address: Willowbank Business Park
Larne BT40 2SF

Agent:
Address
:

Drawing Ref: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20

1. The proposal is contrary to Paras 6.222-6.224 of the SPPS and Policies GP1(a), RE1(a), CS3 and CS5 of MEABC Plan Strategy in that the development would, if permitted, have an unacceptable adverse impact on the visual amenity and landscape character of the area, which is located within the Antrim Coast and Glens Area of Outstanding Natural Beauty by reason of the number, scale, size and siting of turbines and sensitivity of the landscape.
2. The proposal is contrary to Policies RE1(e), GP1(a & e), NAT1, NAT 2 and NAT5 of the MEABC Plan Strategy and paragraph 6.180 and 6.192 of the Strategic Planning Policy Statement for Northern Ireland (SPPS), in that the development, if permitted, is likely to harm a nationally and internationally protected species, listed on Schedule 1 of the Wildlife (Northern Ireland) Order 1985 (as amended); and is likely to result in an unacceptable adverse impact on a rare and threatened native species and Annex I species of the EC Birds Directive (Hen Harrier (*Circus cyaneus*) and Merlin (*Falco columbarius*)).
3. The proposal is contrary to Policies RE1(e), GP1(e), NAT 2 and NAT5 of the MEABC Plan Strategy and paragraph 6.192 of the Strategic Planning Policy Statement for Northern Ireland (SPPS), in that the development, if permitted, is likely to harm a Northern Ireland Priority Species and is likely to result in an unacceptable adverse impact on a threatened red-listed native species (UK Bird of Conservation Concern) – the Curlew (*Numenius arquata*).
4. The proposal is contrary to Policies RE 1(e), GP1(e), NAT1, NAT2 and NAT5 of the MEABC Plan Strategy and paragraphs 6.181 and 6.192 of the Strategic Planning Policy Statement for Northern Ireland (SPPS) as it has not been demonstrated that there will not be an unacceptable adverse impact on protected bird species and adequate and proven compensatory measures have not been provided to offset harm on protected species.
5. The proposal is contrary to Policies RE 1(e), GP1(e), and NAT5 of the MEABC Plan Strategy and paragraph 6.192 of the Strategic Planning Policy Statement for Northern Ireland (SPPS) as it has not been demonstrated that there will not be an unacceptable adverse impact on Northern Ireland Priority Habitats and appropriate compensatory measures have not been provided to offset harm on protected species and insufficient evidence has been provided that active peatland can be successfully established.
6. The proposal is contrary to policies RE1(a), GP1(a) and TOU1 of the MEABC Plan Strategy in that the development, if permitted, would have an unacceptable adverse impact on the intrinsic character and quality of the tourism asset that is the Antrim Coast and Glens Area of Outstanding Natural Beauty by reason of its siting, scale, height and massing.
7. The proposed development is contrary to Policies RE1(e), GP1(a), HE1 of MEABC Plan Strategy and paragraph 6.8 of the SPPS as it has the potential to adversely impact upon the integrity of the settings of several regionally significant scheduled archaeological monuments, namely: Doonan Fort ANT029:004, Ticloy Portal Tomb ANT092:031, Tamybuck Wedge Tomb

ANT029:039) and Antynanum Court Tomb ANT029:092 and insufficient information has been provided to demonstrate otherwise.

8. The proposed development is contrary to Policies RE1(e), GP1(a), HE1 of MEABC Plan Strategy and paragraph 6.8 of the SPPS as it has the potential to adversely impact upon buried archaeological remains within the development site and insufficient information has been provided to demonstrate otherwise.
9. The proposed development is contrary to Policies RE 1(b), GP1 (b), of MEABC Plan Strategy and paragraph 6.224 of the SPPS as it has the potential to adversely impact upon the residential amenity of nearby properties and insufficient information has been provided to demonstrate otherwise.

11. Conclusion

- 11.1 The purpose of this FEI is to update and complement, where appropriate, the environmental information previously submitted and has been produced to include a greater level of details to provide clarity for DFI Strategic Planning Division, based on consultation responses received.
- Updated Planning Statement
 - Updated Lighting Scheme
 - Landscape
 - Archaeology and Cultural Heritage
 - Update Preliminary oHMP/Ecology
 - Ornithology
 - Noise
 - Traffic and Transport
 - Socio-Economic
- 11.2 The Further Environmental Information (FEI) demonstrates that the amendments to the Proposed Development, most notably the reduction in turbine numbers from fourteen to nine and the associated reduction in infrastructure, have successfully reduced the potential environmental effects identified in the original Environmental Statement whilst maintaining a significant renewable energy contribution. The revised layout represents mitigation through design, reducing the overall development footprint and avoiding more environmentally sensitive areas, particularly in relation to landscape, ornithology and designated sites.
- 11.3 The updated technical assessments confirm that potential effects on landscape and visual amenity, cultural heritage, ecology, ornithology, noise and other environmental receptors have either been reduced or remain capable of being appropriately mitigated through embedded design measures and planning conditions.
- 11.4 The proposal will deliver approximately 37.8MW of installed renewable electricity capacity and generate approximately 71GWh of renewable electricity per annum, equivalent to the needs of over 21,000 homes. It will make a direct contribution to regional decarbonisation, renewable electricity generation, energy security and grid resilience. In the context of the statutory target for at least 80% of electricity consumption from renewable sources by 2030, and with that target date approaching, the benefits of the development and its contribution to regional energy objectives should be afforded significant positive weight.
- 11.1 The 2nd Edition of the SPPS places a clear emphasis on the need to maximise sustainable renewable and low carbon energy development and to give appropriate weight to climate considerations. The proposal is therefore strongly supported in principle by the updated regional policy context, subject to the proper assessment and management of local environmental effects

- 11.2 The FEI confirms that the Proposed Development will continue to deliver substantial environmental, economic and social benefits. These include a significant contribution to renewable electricity generation, together with investment, employment and wider economic benefits at both the local and regional level. The amended scheme therefore continues to represent a sustainable form of development that aligns with the strategic objectives of planning policy and wider Government policy for renewable energy.
- 11.3 Overall, the conclusions of the Environmental Statement remain unchanged. The FEI demonstrates that the environmental effects of the amended proposal have been comprehensively assessed and, where necessary, avoided, reduced or mitigated through design evolution and appropriate mitigation measures. When considered in the context of the urgent need to increase renewable energy generation to meet Northern Ireland's statutory climate change targets, the significant environmental, economic and social benefits of the Proposed Development clearly outweigh the limited and acceptable residual effects, including those relating to landscape and visual amenity. It is therefore concluded that the residual environmental effects are acceptable and that the Proposed Development should be regarded as environmentally acceptable and sustainable development.